

Sheffield Plan Main Modifications

Responses – by email

Reference numbers REF5.0501 to REF5.0515

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
REF5.0515	Michael Parkin	Sheffield Green Belt Alliance

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 Wharncliffe 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.

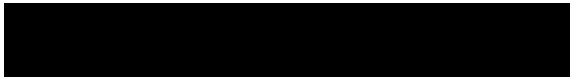
AND

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/Jun 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](#)

Disclaimer

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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

This email shows strong signs of phishing

[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

[REDACTED]

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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This message has been sent using TLS 1.2 Information in this message may be confidential and may be legally privileged. If you have received this message by mistake, please notify the sender immediately, delete it and do not copy it to anyone else. We have checked this email and its attachments for viruses. But you should still check any attachment before opening it. We may have to make this message and any reply to it public if asked to under the Freedom of Information Act, Data Protection Act or for litigation. Email messages and attachments sent to or from any Environment Agency address may also be accessed by someone other than the sender or recipient, for business purposes.

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

[Redacted signature]

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 it 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

REF5.0515

Fwd: [Sheffield Local Plan] Main Modifications Response: Site Capacities

From Sheffield Green Belt Alliance [REDACTED]

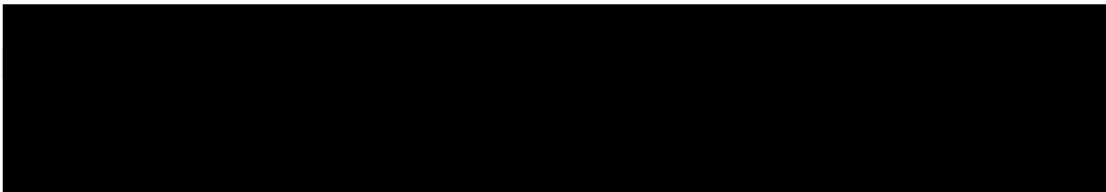
Date Mon 2026-06-15 4:41 PM

To [REDACTED]

Cc [REDACTED]

 1 attachment (7 MB)

Site Capacities Investigation.pdf;



Dear Ms Stephens,

Further to your email, I am forwarding below the Sheffield Green Belt Alliance's representation of 5 May 2026, which does not appear in the published database. As the forwarded message shows, it was sent to the Sheffield Plan email at 11:14 on 5 May 2026, within the consultation period.

I would be grateful if you could confirm receipt and that the attachment opens; confirm that the representation has been placed before the Inspectors; and add it to the published database, attributed to the Sheffield Green Belt Alliance and recorded as received on 5 May 2026 - not as a late submission.

Yours sincerely,

Michael Parkin

===== Forwarded message =====

From: Sheffield Green Belt Alliance [REDACTED]

To: [REDACTED]

Cc: [REDACTED]

Date: Tue, 05 May 2026 11:14:29 +0100

Subject: [Sheffield Local Plan] Main Modifications Response: Site Capacities

===== Forwarded message =====

Dear Local Plan Team,

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

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

Yours sincerely,

Michael Parkin

On behalf of the Sheffield Green Belt Alliance



Representation to the Sheffield Local Plan Examination

Consultation on the Schedule of Proposed Main Modifications

Submitted by: The Sheffield Green Belt Alliance

Date: 5 May 2026

Subject: Housing Trajectory and Green Belt Release Strategy - Main Modifications MM10, MM90, MM92, and the Proposed Additional Allocations (Annex A).

Dear Inspectors,

This representation is submitted on behalf of the Sheffield Green Belt Alliance. It addresses our concerns regarding the soundness of the Sheffield Local Plan, specifically the justification for releasing Green Belt land to support the housing trajectory.

While we maintain our primary position that these 11 proposed additional allocations should not be released from the Green Belt, this submission tests the Council's evidence on a *without prejudice* basis.

Our analysis demonstrates that the Council's claimed housing capacities are derived from generic desktop assumptions that fail to account for the severe, site-specific physical constraints - including mandatory ecological buffers, flood attenuation, and critical mining safety exclusion zones - identified in the Council's evidence.

Because the Plan's stated housing headroom is exceptionally narrow at just 298 dwellings, the capacity overstatements identified within this representation undermine the arithmetic of the entire Plan. The proposed allocations, the housing trajectory, and the Green Belt release strategy have not been shown to be justified or effective.

We respectfully request that the Inspectors consider the site-by-site constraint analysis enclosed herein when determining the soundness of the Proposed Main Modifications.

Contents

1	Introduction: Site Capacities and Green Belt Release	3
2	MM331: NWS30 Land at Forge Lane	6
3	MM332: NWS31 Land between Storth Lane and School Lane	7
4	MM351: NES37 Land between Creswick Avenue and Yew Lane	9
5	MM352: NES38 Land to the west of Grenoside Grange, Fox Hill Road	11
6	MM353: NES39 Land at Wheel Lane and Middleton Lane	13
7	MM410: SES29 Handsworth Hall Farm, Land at Finchwell Road	15
8	MM411: SES30 Land between Bramley Lane and Beaver Hill Road	17
9	MM429: SS19 Land to the south of White Lane S12 3HS	20
10	MM440: SWS18 Land between Lodge Moor Road and Redmires Conduit	22
11	MM441: SWS19 Land to the north of Parkers Lane	24
12	MM461: CH05 Land to the east of Chapeltown Road	25
13	Conclusion	27
	Appendices	28
A	Schools and Burial Grounds Cannot Satisfy Policy NC15	28
B	NES37 Quantification of Ecological Constraints	29
C	NES39 Detailed Constraint Analysis	30
D	SES29 Detailed Constraint Analysis	31
E	Map of Constraints on SES29	33
F	SES30 Quantification of Ecological Constraints	34
G	SS19 Robin Brook Buffer Constraints	35
H	Maps of SWS18 Constraints	37

1 Introduction: Site Capacities and Green Belt Release

This representation tests the housing capacities claimed for the 11 proposed additional Green Belt site allocations against the site-specific evidence assembled during examination.

The central issue is not whether the Council is entitled to estimate site capacities at the plan-making stage. It is whether the capacities put before the examination are realistic and evidenced once known site-specific constraints are taken into account. The reliability of these capacities matters because they form the arithmetic upon which the proposed Green Belt release is *justified*.

1.1 Purpose of this Representation and Without Prejudice Position

This representation should not be read as support for the development of any of the proposed additional Green Belt allocations. Our primary position is that these sites should not be released from the Green Belt or allocated for development.

The capacity estimates below are advanced on a without prejudice basis. They are not proposed capacities, and they do not imply that a reduced form of development would be acceptable. They are used only to test the soundness of the Council’s assumptions.

The Council relies on these sites to justify Green Belt release and support the housing trajectory. If the realistic capacities are materially lower than those claimed, the problem is not simply that the numbers should be adjusted downwards. It is that the allocations, the trajectory and the release strategy have not been shown to be justified or effective.

1.2 “Narrow” Headroom

The capacity question is therefore not peripheral. It goes directly to whether the Council’s Green Belt release strategy and housing trajectory are sound.

Following the Inspectors’ post-hearing letter of January 2026 [1], the Council’s Schedule of Proposed Main Modifications has formalised the housing trajectory: MM10 and MM90 establish an amended requirement of 38,012 net new homes against a total supply of 38,318. As calculated in MM92 (Table 3), this leaves a headroom of just 298 dwellings, which the Inspectors themselves described as “narrow”.

The proposed additional Green Belt site allocations are stated to provide capacity for 3,906 homes. Even a modest overstatement of those capacities - in the order of 7–8% - would erase the entire headroom.

1.3 Generic Formulas vs. Actual Constraints

The capacities of the proposed additional site allocations are calculated using generic HELAA “rules of thumb” [2, para. 3.7], with assumptions of 90/80/70% net developable areas based on site size [3, Appendix 1]. Similarly, generic density multipliers, e.g., 35 or 40 dwellings per hectare (dph), tied to broad accessibility metrics have been used. While the Council may consider these to

be “conservative” estimates of capacity, applying a generic mathematical formula to constrained Green Belt locations ignores the mitigations required to develop such sites appropriately.

The HELAA methodology acknowledges that its findings do not stand alone, and states that the HELAA’s role within the wider evidence base is to be used “in conjunction with and alongside other evidence”, such as “strategic flood risk assessments” (SFRAs) [3, para. 1.7].

This representation does not challenge the HELAA as a broad assessment tool, nor does it set out to masterplan these sites. Its narrower task is to acknowledge the constraints the evidence base now identifies and to test whether the Council’s capacity figures remain realistic against them. The bar at examination is realism, not precision; the Council’s failure is to leave generic figures in place even as that evidence has become site-specific.

1.4 Evidence Chronology

The initial site appraisals and capacity figures were provided before much of the site-specific evidence existed. Important evidence bearing directly on site capacity - including SFRAs, ecological appraisals, Biodiversity Net Gain (BNG) studies, access work, heritage material and statements of common ground with key bodies - was produced only later. The Council’s evidence is therefore internally inconsistent. The capacities advanced for these allocations were fixed first and have not been revisited in light of the later evidence the Council has assembled, even though that material goes directly to the amount of land that can be developed on each site.

1.5 Summary of Soundness Concern and Capacity Adjustments

In summary, this is not a complaint that the Council used generic “rules of thumb”; the HELAA plainly allows that approach. It is the simpler point that, once later material identified site-specific constraints capable of affecting the developable area, the Council needed to show whether those matters were already sufficiently reflected in the original rule-of-thumb figures or whether a further adjustment was required. That explanation is absent.

The housing yields underpinning the proposed Green Belt release are therefore not founded on proportionate, site-specific evidence, and are not justified or effective under NPPF paragraph 35.

MM223 inserts the wording that “the dwelling capacities shown in this Annex (and in Part 1, Appendix 1) are indicative only”. Indicative does not mean immaterial. Where the claimed yield is part of the case for why Green Belt release of these sites is necessary - and where the overall trajectory has only a 298-dwelling headroom - the additional allocations must be sound on a realistic capacity, not a generic, untested proxy.

The remainder of this representation demonstrates, using the examination evidence base and promoter’s representations from previous consultations, how the evidence reduces the claimed yield of the proposed site allocations on a site-by-site basis. Table 1 summarises the Council’s assumptions against the realistic, constraint-based capacities in this submission.

MM	Site	Claimed Capacity	Constraint-Based Capacity	Difference	Primary Constraints
MM331	NWS30	69	50–55	-19 to -14	LWS Buffer, Heritage
MM332	NWS31	103	71–77	-32 to -26	LWS Buffer, Footpaths
MM351	NES37	592	354–413	-238 to -179	Watercourse, Ecology, Footpaths, Access
MM352	NES38	188	130–152	-58 to -36	LWS Buffer, Complex Layout
MM353	NES39	66	38–41	-28 to -25	LWS Buffer, Heritage
MM410	SES29	870	550–600	-320 to -270	Mine Entries/DHRA, LWS, Train station parking
MM411	SES30	827	480–560	-347 to -267	Mine Entries/DHRA, Watercourse, Archeology, LWS Buffers
MM429	SS19	304	168–175	-136 to -129	Watercourse, Landscape
MM440	SWS18	258	134–149	-124 to -109	LWS Buffer, PDNP Setting, Pipeline, Combined Sewer
MM441	SWS19	80	25–30	-55 to -50	PDNP Setting, Topography
MM461	CH05	549	385–420	-164 to -129	Mine Entries/DHRA, LWS, Topography
Total		3,906	2,385–2,672	-1,521 to -1,234	<i>4–5x entire Plan headroom</i>

Table 1: Comparison of generic HELAA capacities against site-specific, constraint-led capacities.

Across the 11 sites, the constraint-based approach reduces the Council’s claimed capacity by roughly one-third to two-fifths - an overstatement of 1,234–1,521 dwellings, or 4–5 times the Plan’s entire headroom.

The structure of this representation is as follows. Pages 6–26 set out the site-specific capacity assessments. Page 27 draws together the overall soundness implications. Pages 28–37 contain supporting appendices, including calculations, constraint analysis and mapping. References begin on page 38.

2 MM331: NWS30 Land at Forge Lane

MM331 proposes allocating NWS30 for 69 homes. This is based on a gross site area of 2.56 hectares and an assumed net developable area of 2.30 hectares. That reflects the generic HELAA rule of thumb for sites below 5 hectares, which assumes that 90% of the site can be developed. That may be a reasonable starting point. However, the site-specific evidence points to a much lower percentage of developable area, and a realistic, deliverable yield of between **50–55 dwellings**.

2.1 The site-specific evidence

In their 2018 site promotion document, the promoter masterplanned a larger 3.19-hectare version of this site for 74 homes [4, p. 3]. That masterplan identified a gross developable area of 2.14 hectares, equivalent to a net developable ratio of 67%.

That is lower than the 90% ratio assumed in MM331. The difference matters; the Council's calculation leaves only 0.26 hectares outside the developable area. The promoter's site-specific masterplan shows that a much larger allowance is needed to deal with the site's physical constraints.

2.2 Why the lower ratio is more realistic

The lower ratio is explained by constraints around almost every edge of the site:

- **Northern Boundary:** MM331 requires a minimum 15m buffer from the adjacent Local Wildlife Site woodland canopy.
- **Southern Boundary:** the promoter's masterplan identifies a 15m offset between the pumping station and habitable rooms.
- **Eastern Boundary:** the promoter's constraints plan identifies a 9m offset from the Mill Race. MM331 also requires a pedestrian/cycle route here as part of the Upper Don Trail.
- **Western Boundary:** MM331 requires vehicle access from Langsett Road North. The promoter's document identifies an existing retaining wall along this boundary, meaning access is likely to require earthworks and retaining structures.
- **Heritage Setting:** MM331 requires mitigation to avoid harm to the significance and setting of Oughtibridge Forge. The promoter's material also shows development set back from the south-eastern boundary.

These are not layout preferences. They are fixed boundary constraints which reduce the land available for housing. They explain why the promoter's masterplan used a much lower net developable ratio than the Council's rule-of-thumb.

2.3 Realistic capacity

Applying the promoter's site-specific net developable ratio of 67% to the Council's 2.56-hectare site gives a realistic developable area of approximately 1.71 hectares.

The Council’s capacity figure implies a density of approximately 30 dph. Applying that same density to the realistic developable area gives: $1.71 \text{ ha} \times 30 \text{ dph} = 51.3$ dwellings. The realistic capacity of NWS30 is therefore between **50–55 dwellings**, not the 69 assumed.

3 MM332: NWS31 Land between Storth Lane and School Lane

The Council proposes a capacity of 103 dwellings for NWS31, based on a gross site area of 3.85 hectares and a net developable area (NDA) of 3.42 hectares. That reflects the generic HELAA net developable ratio for sites below 5 hectares. However, the Council’s site-specific evidence shows that this ratio is not realistic for NWS31.

The Council, acting as landowner, commissioned an Illustrative Concept Plan and Density Study prepared by Enjoy Design and Carter Jonas [5]. That study identifies a slightly larger gross site area of 3.96 ha, but only 2.56 ha as the net site area, equivalent to a net developable ratio of 64.6%.

The difference is material. The Council’s generic methodology says 3.42 ha can be developed. Its site-specific concept plan shows only 2.56 ha. That is a reduction of 0.86 ha, or around one quarter of the assumed developable area.

3.1 Why the lower developable area is more realistic

The lower figure in the concept plan is explained by the site’s constraints. These are not optional design choices. They arise from MM332, the Level 2 SFRA [6], and the Preliminary Ecological Appraisal (PEA) [7].

In particular, the site must allow for:

- **Drainage and Flood Risk:** the SFRA requires 0.27 ha for surface-water attenuation, identifies Flood Zone 3b land associated with Tinker Brook, and requires an 8m no-development buffer from the channel bank.
- **Surface-Water Flow Paths:** the SFRA identifies active flow paths across the southwestern and southern parts of the site. These must be kept open and incorporated into the landscape design, which reduces the efficiency of the layout.
- **Ecology, Woodland and Public Access:** MM332 and the PEA require a 15m buffer from the adjacent ancient woodland / Local Wildlife Site, together with the retention of internal tree lines, a species-rich hedgerow and existing public footpaths.
- **Heritage Setting:** MM332 identifies heritage impacts and requires mitigation to avoid or minimise harm to the significance and setting of the affected heritage asset.

These constraints explain why the site-specific concept plan produces a much lower NDA than the Council’s generic calculation.

3.2 Density

The Council’s capacity figure also depends on an inappropriate density assumption. If 103 homes are applied to the realistic 2.56 ha net area, the resulting density is just over 40 dph.

That is an urban density. It does not reflect the character of Wharnccliffe Side, which the HELAA treats as a “larger village”. The HELAA assumption for rural locations is 30 dph. Applying an urban density to a sloping, semi-rural Green Belt edge site is not justified simply because the generic capacity figure requires it.

3.3 BNG and Green Belt mitigation

The same problem arises with BNG and Green Belt compensatory improvements. MM332 requires compensatory improvements for the Green Belt release, and requires onsite BNG delivery in the first instance. The evidence identifies a high baseline value of 34.89 habitat units onsite [8].

Delivering 103 homes would leave little flexibility to retain existing habitats or provide meaningful onsite mitigation. The Statement of Common Ground says the site is viable [9, para. 6.2], but does not explain how the costs and land requirements of BNG, Green Belt compensation and site-specific mitigation have been reconciled with the 103-home capacity.

3.4 Conclusion

The proposed capacity of 103 dwellings is not justified. It relies on a generic NDA of 3.42 ha, but the Council’s site-specific concept plan identifies only 2.56 ha as the net site area.

Using that realistic net area, and applying the HELAA rural-location density of 28–30 dph, produces a capacity of approximately **71–77 dwellings**, not the 103 assumed.

4 MM351: NES37 Land between Creswick Avenue and Yew Lane

MM351 states the gross site area for NES37 as 29.80 hectares, of which 7 hectares are safeguarded for education use and 4 hectares for a multi-faith burial ground, leaving a “gross site area for housing” of 18.80 hectares [10, p. 3]. This housing area is well above the 10-hectare threshold that prescribes a 70% net developable ratio under the HELAA’s “rules of thumb”, yet the Council has applied a 90% ratio.

4.1 The Mathematical Difficulty of the 90% Ratio

By applying a 90% net developable ratio to the 18.80-hectare housing parcel, the Council assumes that 16.92 hectares can be developed, leaving 1.88 hectares (10%) to accommodate *all* residential infrastructure, estate roads, pavements, and site-specific mitigation for 592 homes.

Policy NC15 requires developments of this scale to designate at least 10% of the gross housing site as public open space. Because the Council’s site appraisal confirms the surrounding area is “more than 20% below policy standard” [2, p. 63], the full 10% (1.88 hectares) must be provided onsite.¹

The 1.88-hectare allowance is therefore consumed by mandatory open space alone, leaving nothing for internal access roads, pavements or the site-wide constraints below.

4.2 Apportioning Site-Wide Constraints

The evidence base identifies non-colocatable physical constraints that affect the entire allocation:

- **Flood Risk (SuDS):** The Level 2 SFRAs require approximately 9.5% of the total area for surface water attenuation basins to manage a 1% AEP plus 40% climate change event. Across the whole site, this consumes a minimum of 3.20 hectares [11, p. 15, 12, p. 17]; high groundwater levels preclude infiltration SuDS, requiring surface basins.
- **Ecological Buffers:** As detailed in B, the land required to protect mandatory water-course buffers, 1.93km of species-rich hedgerows, and 16 irreplaceable veteran trees is a conservative 4.90 hectares.

Combined, these site-wide hard constraints total 8.10 hectares.

These constraints cannot sit within the 11 hectares of safeguarded school and burial ground land: schools require level playing pitches and secure perimeters; burial grounds require stable, unflooded geology; and neither can host the site’s deep attenuation basins, ancient veteran trees or unmanaged wildlife buffers. A proportional split, applied below, is therefore generous to the Council. Even so, apportioning evenly by area, the 18.80-hectare housing parcel (63.1% of the total 29.80-hectare allocation) has the following proportional share:

8.10 ha (total hard constraints) $\times$ 63.1% = 5.11 ha (housing’s proportional constraint).

¹The school and burial ground cannot count toward the open space requirement; see A.

4.3 Qualitative Constraints and Fragmentation

Even if the 11.81-hectare ceiling is accepted, further MM351 conditions reduce the layout efficiency of the remaining area:

- **Retained Footpaths:** MM351 mandates that existing “public/permissive footpaths that cross the site will be retained”. Forcing a new suburban street hierarchy around fixed historic alignments creates geometric inefficiencies and fragmented parcels.
- **Heritage and Visual Buffers:** The site contains historic landscape characteristics, archaeological interest and the setting of nearby heritage assets; MM351 mitigation for “significant visual and landscape impacts” requires structural landscaping and lower-density zones.
- **Complex Access:** The primary highway access off Creswick Lane plus secondary accesses off Yew Lane and The Wheel require a land-intensive internal road hierarchy.

The 18.80-hectare housing parcel must also absorb its own internal road network and respond to these layout constraints, pushing the actual net developable area below the 11.81-hectare theoretical maximum.

4.4 Conclusion: A Credible Capacity Range

Deducting the proportional constraints and mandatory open space from the housing parcel:

- **Gross housing area:** 18.80 ha
- *Minus* mandatory open space (10%): -1.88 ha
- *Minus* proportional constraints (63.1% share): -5.11 ha
- **Realistic maximum net developable area:** 11.81 hectares

The resulting 11.81-hectare footprint (62% net developable ratio) supports a yield calculated at the HELAA’s lower density of 30 dph for “rural locations and larger villages”. Applied to the 11.81 hectares, this yields 354 dwellings. Even if the Council’s assumed 35 dph urban density were applied, it would yield a maximum of 413 dwellings.

The Council’s housing yield of 592 dwellings is unachievable. The justified and effective capacity for NES37 is between **354–413 dwellings**.

5 MM352: NES38 Land to the west of Grenoside Grange, Fox Hill Road

MM352 establishes a gross site area of 6.70 hectares and a net housing area of 5.38 hectares. This assumed 80.3% net developable ratio aligns with the generic “rule of thumb”, leaving a 20% allowance (1.34 ha) for all non-housing infrastructure, roads, open space, and site-specific mitigation.

5.1 The Mathematical Shortfall

Mandatory policy and technical requirements calculated from the 6.70-hectare gross area exceed this allowance:

- **Standard Infrastructure:** On a standard development, estate roads, pavements, and utilities typically consume at least 10% of the gross area (0.67 ha).
- **Public Open Space:** Policy NC15 requires a minimum of 10% of the gross site area (0.67 ha) to be provided as public open space.
- **Surface Water Attenuation:** The Council’s Level 2 SFRAs mandate significant onsite attenuation, requiring 0.73 ha for 1.5m deep SuDS ponds across the site’s two parcels.

These three deductions alone total 2.07 ha, exceeding the Council’s 1.34 ha allowance.

5.2 Spatial and Policy Constraints Reducing Capacity

Further spatial buffers mandated by MM352 within these “tight site allocation boundaries” [13, p.9] reduce the footprint further:

- **Ecological Buffers:** MM352 mandates a 15m buffer from the canopy edge of the adjacent Local Wildlife Site (LWS) and ancient woodland. Because the LWS bisects the site, this buffer applies to an irregular, elongated boundary that consumes a disproportionate share of the gross area. Sheffield & Rotherham Wildlife Trust evidence indicates that 15m is itself inadequate to protect the LWS from air, light and noise pollution [14].
- **Hospital Amenity Standoffs:** MM352 requires mitigation of noise, dust, and vibration impacts on the adjacent Grenoside Grange Hospital through design and layout, necessitating physical standoff buffers and restricted back-to-back distances along the shared boundary.
- **Visual and Landscape Integration:** MM352 requires mitigation of significant visual and landscape impacts. Given the site’s elevated, urban-fringe position, standard practice dictates structural boundary planting (e.g., 10–15m wide native tree belts) along the exposed western edge on Fox Hill Road, which must be dedicated Green Infrastructure.
- **Air Quality Mitigation:** The site is within 200m of the A61. The HELAA methodology acknowledges the precautionary principle of restricting housing within 200m of such emission sources [3, p.14], likely forcing residential units to be set back from the eastern boundary.

- **Heritage Asset Setting:** The Council identifies Holme Lane Farm as a mid-19th-century non-designated heritage asset [15, p. 2]. To avoid harm to its significance, development must respect its setting, precluding high-density suburban housing and dictating a lower-density layout in the eastern parcel.

NES38 is a landscape-led site constrained by a hospital and a heritage asset. The site appraisal records that the landscape has lower capacity to absorb development and requires mitigation through design and layout [2, p. 46]. The masterplan must provide structural landscaping, softer edges, air quality setbacks and retained features, all of which are land-consuming.

5.3 The Limits of Multi-Functional Green Infrastructure

While the Council may argue that SuDS, open space and ecological buffers can be combined as “multi-functional green infrastructure”, NES38 limits such overlap:

- **SuDS vs. Open Space:** The SFRA mandates 1.5m deep attenuation ponds. Deep, engineered water storage basins with fluctuating water levels cannot safely or practically double as the primary usable recreational open space required by Policy NC15.
- **Excavation vs. Root Protection:** SuDS attenuation features and utilities cannot be excavated within the 15m Local Wildlife Site and ancient woodland buffers without destroying the root protection areas of the trees the buffer is designed to protect.
- **Recreation vs. Ecology:** Policy NC15 public open space brings active recreational pressure, noise, and domestic pets. Co-locating this use against the LWS and ancient woodland boundary contradicts the purpose of an ecological buffer.

5.4 Conclusion: Realistic Capacity Estimate

The quantified deductions in §5.1 total 2.07 ha (30.9% of the gross site), exceeding the Council’s 20% deduction assumption [16, para. 4.25] and reducing the developable footprint to 4.63 ha, equivalent to a 69.1% net developable ratio, before any of the spatial constraints in §5.2 are accounted for.

Those §5.2 constraints consume more land, and §5.3 shows why they cannot simply be co-located with the quantified deductions or with each other. A working figure of a 65% net developable ratio, equivalent to 4.35 ha, leaves only 0.28 ha (4.2% of the gross site) for the LWS canopy buffer, hospital amenity standoff, A61 air quality setback, western tree belt, and heritage setting allowance *combined*. Those constraints together exceed 0.28 ha on any reasonable view: 4.35 ha is therefore a ceiling generous to the Council, not the realistic figure.

Even at that generous ceiling, a high-density multiplier is not appropriate for an urban-fringe site requiring softer edges, internal green corridors and heritage standoffs. Applying a suburban density of 30–35 dph to 4.35 ha yields a deliverable capacity of **130–152 dwellings**, against the 188 homes claimed.

6 MM353: NES39 Land at Wheel Lane and Middleton Lane

The reduction of the site to *Parcel A* is welcome, but the current proposal of 66 homes is neither justified nor effective: it relies on a density and a net developable area that do not reflect the site’s physical constraints or the Inspectors’ specific directions.

The Inspectors’ post-hearing letter found that the site makes a “strong contribution to the character and setting of the local area” [1, para.14]. Their acceptance that Parcel A was “more contained” was linked to policy wording to “maximise retention of stone walls” and “retain and enhance planting on the eastern and western boundaries” [1, para.15]. MM353 now contains a requirement to mitigate “wider landscape and visual impacts through the design and layout of the development”.

The Council’s capacity estimate of 66 homes is based on a density of 35 dph, treating the site as a “less accessible urban location” in accordance with the HELAA methodology [3, Appendix 1]. However, that is a generic assumption, not a site-specific assessment the HELAA allows. The Inspectors’ findings above describe the characteristics the HELAA associates with “rural locations and larger villages”, not the “less accessible urban locations” category the Council has applied. The corresponding HELAA density is 30 dph, which is therefore the appropriate figure for NES39 - and arguably an upper bound, given the strength of those landscape findings.

MM353 assumes a 90% net developable ratio (1.89 ha from a gross area of 2.10 ha), which is difficult to reconcile with the following policy requirements:

- **Public Open Space:** Policy NC15 requires 10% of the gross site area, removing 0.21 hectares.
- **SuDS Attenuation:** The Level 2 SFRA (EXAM 133I) requires 7.8% of the site area for flood storage, removing a further 0.16 hectares.

These two requirements alone consume 0.37 ha (17.8%), capping the developable footprint at 82.2% (1.73 ha) before any site-specific constraint is considered.

The realistic net developable area falls further once the site-specific constraints mandated by MM353 and the Inspectors are included:

- **15m LWS Canopy Buffer:** MM353 mandates no development within 15m of the woodland canopy edge.
- **Historic Stone Wall Standoff:** The Inspectors directed the retention of the historic stone walls. Protecting this approximately 130m section of stone wall requires a minimum 4–5m exclusion corridor. This removes an estimated 0.065 hectares and restricts internal road layouts.
- **Boundary Planting:** Required retention and enhancement of eastern and western boundary planting will necessitate root protection areas, further reducing the developable land.

6.1 Layout and Infrastructure Severance

The site's hard constraints - SuDS basins, public open space, woodland root protection and historic wall foundations - cannot be safely co-located with each other. When combined with the topographical difficulty of securing compliant highway access exclusively from Wheel Lane, the efficiency of the layout is compromised.

The Council has not shown how their net developable ratio could be achieved without substantial breaches in the stone wall or loss of boundary planting, which is difficult to reconcile with the Inspectors' instructions. Squeezing housing blocks and access roads between these overlapping buffers fragments the parcel and further reduces layout efficiency.

6.2 Realistic Yield and Conclusion

The quantified deductions - POS (0.21 ha), SuDS (0.16 ha) and the stone wall standoff (0.065 ha) - total 0.435 ha, or 20.7% of the gross site. The developable footprint is therefore 1.665 ha, equivalent to a 79.3% net developable ratio, before the LWS canopy buffer, boundary planting root protection and Wheel Lane layout severance are accounted for.

These three remaining constraints cannot be precisely quantified without site-specific measurements. However, a working figure of a 65% net developable ratio - equivalent to 1.37 ha - leaves only 0.30 ha (14% of the gross site) to absorb the canopy buffer along the entire northern frontage, root protection on the eastern and western boundaries, and the Wheel Lane layout fragmentation *combined*. Those three constraints together will exceed 0.30 ha on any reasonable view: 60–65% is therefore a ceiling generous to the Council, not the realistic figure.

Even at that ceiling, the HELAA's rural-location density of 30 dph applied to a 1.26–1.37-hectare NDA yields **38–41 dwellings** rather than the 66 assumed.

7 MM410: SES29 Handsworth Hall Farm, Land at Finchwell Road

MM410 proposes a mixed-use allocation comprising 870 homes on a net housing area of 24.84 hectares, alongside 20 hectares of employment land. The Council assumes a total net developable area (NDA) of 44.84 hectares from a gross site of 56.40 hectares, representing a net developable ratio of nearly 80%.

The 870-dwelling figure is an overestimate; the realistic capacity is between 550 and 600 dwellings.

This site lies in the narrow gap between the built-up areas of Sheffield and Rotherham, serving the most fundamental purpose of Green Belt: preventing neighbouring towns from merging [17, para. 138(b)]. If the site delivers substantially fewer homes than claimed, the exceptional circumstances case for its release is correspondingly weakened.

Evidence against the Council’s claimed capacity comes from the site promoter’s July 2025 submission, whose indicative masterplan details these spatial calculations [18, Appendix 2]:

- **Residential NDA:** 19.13 hectares (falling short of the Council’s 24.84 ha).
- **Industrial NDA:** 15.46 hectares (falling short of the Council’s 20 ha).
- **Total Masterplan NDA:** 34.59 ha - a net developable ratio of 61.3%, not 80%.

7.1 The Density Contradiction and Landscape Sensitivity

To achieve the 870 homes claimed, the promoter states on the masterplan key that they rely on an urban yield of 45 dph. This density is not appropriate for this edge-of-settlement, former Green Belt parcel that envelops a Local Wildlife Site (LWS) and sits adjacent to ancient woodland.

The Council’s landscape assessments confirm this. The Integrated Impact Assessment (IIA) finds the Handsworth landscape “fairly sensitive to change and development will likely result in negative effects in terms of the character, openness and the function of land” [19, p. 242], and that “unless the scale of growth is lowered considerably, it would be difficult to avoid and mitigate these effects”. The planning appraisal for SES29 corroborates: the “landscape has low capacity for absorbing development” and mitigation must be provided through design and layout [2, p. 69].

An urban density of 45 dph is incompatible with that low absorption capacity. Applying the appropriate suburban density of 35 dph to the promoter’s 19.13 ha residential NDA yields 669 homes - an immediate shortfall of over 200 units.

7.2 Masterplan Deficits and Severe Site Fragmentation

Even the revised 669-home baseline (19.13 ha NDA) must be treated as a ceiling. Although the developer has already reserved over 12 hectares for non-housing uses, the examination library and constraints mapping show that the layout still fails to accommodate several mandatory requirements and ignores severe internal fragmentation.

These “masterplan deficits” - described in [D](#) - include:

- A 1.07-hectare shortfall in required SuDS provision, which is critical for protecting downstream villages like Catcliffe [20].
- The complete omission of land-intensive train station car parking mandated by MM410.
- No-build exclusion zones around three identified mine entrances.
- Layout inefficiency from a Roman road bisecting the eastern residential parcel, and highway infrastructure severing the south-eastern boundary into unusable fragments.
- 15m ecological buffers to the adjacent Waverley Pond and Handsworth Tip Local Wildlife Sites, and root-protection zones for ancient/veteran trees and native hedgerows scattered across the site.

These omitted requirements and physical barriers must be accommodated within the red line, reducing the 19.13 ha residential NDA further.

7.3 Conclusion

The Council's claimed net developable area for SES29 - 24.84 ha residential alongside 20 ha employment - is not deliverable on this site. The Council's 80% net developable ratio is contradicted by the promoter's 61.3% masterplan, and the 45 dph density violates the IIA requirement to lower the scale of growth.

The 19.13 ha promoter NDA must be reduced further to absorb the §7.2 deficits. The SuDS shortfall alone removes 1.07 ha, taking the residual to 18.06 ha. That land must absorb five remaining constraints: station car parking mandated by MM410, no-build zones around three mine entrances, the Roman road corridor, the south-eastern highway fragmentation, and ecological buffers around the adjacent LWS and onsite veteran trees.

A working range of 15.5–17.0 ha for the realistic NDA leaves only 1.06–2.56 ha for those five combined - tight at the 17.0-hectare upper bound, generous only at the 15.5-hectare lower. The 17.0-hectare figure is therefore a ceiling, not a midpoint.

Applying 35 dph to that 15.5–17.0-hectare NDA yields approximately **550–600 dwellings**. The Inspectors are respectfully requested to adjust the housing trajectory for SES29 to that range, not to the 870 homes assumed.

8 MM411: SES30 Land between Bramley Lane and Beaver Hill Road

MM411 states the gross site area for SES30 as 35.28 hectares. With 5.00 hectares safeguarded for a secondary school and 4.00 hectares for a burial site, the specific “gross site area for housing” is 26.28 hectares.

Despite this gross housing area sitting well above the 10-hectare threshold - which prescribes a 70% net developable ratio under the HELAA’s generic “rules of thumb” - the Council has applied a 90% net developable ratio to achieve their target capacity, similar to NES37.

8.1 The Mathematical Impossibility of the 90% Ratio

By applying a 90% net developable ratio to the 26.28-hectare housing parcel, the Council assumes that 23.65 hectares can be developed, leaving just 2.63 hectares (10%) to accommodate *all* residential infrastructure, estate roads, pavements, and other mitigation for 827 homes.

While the Council’s site appraisal suggests existing open space in the area may offset the strict 10% requirement of Policy NC15, the 2.63-hectare allowance is still mathematically incapable of absorbing the massive site-wide physical constraints identified in the evidence base.

8.2 Apportioning Site-Wide Constraints

The evidence base identifies non-colocatable physical constraints that affect the entire 35.28-hectare allocation:

- **Flood Risk (SuDS):** The Level 2 SFRAs for the two parcels comprising this site (S03020 and S02502) require a combined 3.62 hectares of land for 1.5m deep surface water attenuation basins to safely manage a 1% AEP plus 40% climate change event.
- **Ecological Buffers:** As detailed in [F](#), the land required to protect 3.38km of hedgerows, 9 irreplaceable veteran trees, and the mandatory buffers to the adjacent Local Wildlife Sites and onsite watercourses is 7.28 hectares.
- **Archaeological Exclusion:** The site contains significant known archaeological interest, including a 3-hectare field and an unquantified Quaker burial site in the northern field, which require spatial mitigation and standoffs.

Combined, these site-wide hard constraints require a minimum of 13.9 hectares.

The Council cannot rely on the assumption that these 13.9 hectares of constraints will fall mostly within the 9 hectares of safeguarded school and burial ground land. A secondary school requires level sports pitches and secure perimeters, not a 3-hectare archaeological exclusion zone or a 1.5m deep flood attenuation basin. A burial ground requires well-drained, stable geology, not dense veteran tree root networks or surface water flow paths.

The proportional split applied below is therefore generous to the Council: in practice, the most restrictive constraints - deep attenuation basins, archaeological exclusion zones, veteran tree root protection - are spatially incompatible with the safeguarded uses and will fall within the housing

parcel. Even setting that aside and apportioning evenly by area, the yield fails: the 26.28-hectare housing parcel (which constitutes 74.5% of the total 35.28-hectare allocation) must absorb its proportional share:

13.9 ha (total hard constraints) $\times$ 74.5% = 10.36 ha (housing’s proportional constraint).

8.3 Qualitative Constraints and Fragmentation

Even if the residual gross housing area is accepted as a mathematical ceiling, the layout efficiency of this remaining land will be compromised by further unquantified conditions mandated within MM411 and the wider evidence base:

- **Mining Safety (DHRA):** The examination library confirms the northern and southern extents of the site are located within a Development High Risk Area containing shallow coal workings [21, p. 2]. Their exclusion zones will further reduce the developable area.
- **Retained Footpaths:** MM411 mandates that existing public/permissive footpaths crossing the site must be retained. Forcing a new suburban street hierarchy around fixed historic alignments creates geometric inefficiencies and fragmented parcels.
- **Landscape Setting and Visual Impact Mitigation:** The site occupies a visible position and is bounded by three Local Wildlife Sites. MM411 requires mitigation for “significant visual and landscape impacts” whilst enabling integration with the surrounding area. Mitigating a prominent skyline development in this sensitive setting cannot be achieved through perimeter planting alone; it requires a landscape-led design with structural boundary planting, fragmented housing parcels, substantial internal tree planting to break up rooflines, and a softer, low-density transition to the adjacent Green Belt. This restricts the site’s capacity to absorb a high-density urban layout.

Because the housing parcel must absorb its own internal road network and respond to these layout-severing conditions, the actual net developable area will fall well below the theoretical maximum.

8.4 Conclusion: A Credible Capacity Range

Deducting the proportional constraints from the housing parcel establishes the maximum land available for residential use:

- **Gross housing area:** 26.28 ha
- *Minus* proportional constraints (74.5% share): -10.36 ha
- **Realistic maximum net developable area:** 15.92 hectares

This 15.92-hectare footprint equates to a 61% net developable ratio, which reflects the extreme complexity of a site encumbered by archaeological fields, mining risks, and multiple overlapping ecological buffers.

The Council’s assumption that this residual footprint can support 35 dph is at odds with the site’s prominent location. The site is visible in views towards the 12th-century St Mary’s Church, Woodhouse village, the villages of Fence and Aston, and beyond; it can be seen from the M1

motorway over 3 miles away. To satisfy the MM411 requirement for visual mitigation and landscape integration, the development must be landscape-led. The HELAA establishes a lower density of 30 dph for rural edge and transition locations. Applying this contextually appropriate 30 dph density to the 15.92 hectares yields 478 dwellings. Even applying the Council's assumed 35 dph urban density to this parcel yields a maximum of 558 dwellings.

This constraint-based assessment is firmly grounded in local reality. The Ballifield estate in the immediate vicinity achieves a gross density of 22 dph. Applying this real-world gross multiplier to the 26.28-hectare housing parcel yields 578 dwellings - strongly supporting the constraint-led ceiling.

The justified and effective capacity for SES30 is between **480–560 dwellings**.

9 MM429: SS19 Land to the south of White Lane S12 3HS

For proposed allocation SS19, the Council calculates a capacity of 304 homes by applying a 70% net developable ratio to the 10.84-hectare gross site area. This produces an assumed net developable area of 7.59 hectares. The Council then applies an urban density of 40 dph.

That calculation leaves only 3.25 hectares for all non-housing land requirements. The site-specific evidence indicates that this allowance is not enough.

9.1 Quantified site constraints

The following quantified requirements alone total approximately 3.92 hectares:

- **Robin Brook Buffer:** MM429 requires a minimum 15m buffer on either side of Robin Brook to be protected from built development. However, new site-specific evidence (detailed in [G](#)) indicates that this buffer must be measured from the edge of the tree canopy. This results in a 24m buffer from the brook's centreline. Geospatial mapping of this updated 24m buffer shows it removes 1.917 hectares from the developable area.
- **Public Open Space:** Policy NC15 requires developments of this scale to provide 10% of the site as open space. The Council's site appraisal confirms that the surrounding area is "more than 20% below policy standard" [[2](#), p. 37]. NC15's open-space exception therefore cannot safely be relied on. This requirement is approximately 1.08 hectares.
- **SuDS Attenuation:** The Level 2 SFRA requires 8.5% of the total site area for flood storage to manage the 1% AEP plus 40% climate change event [[22](#), p. 15]. This requires approximately 0.92 hectares. Because excavating a 1.5m deep pond would damage the ancient woodland along Robin Brook, this land cannot overlap with the Robin Brook buffer.

These three requirements alone total approximately 3.92 hectares. That already exceeds the 3.25 hectares allowed by the Council's generic 70% net developable ratio.

9.2 Further site-specific land requirements

A realistic masterplan would also need to allow for:

- **Infrastructure and Heritage Buffers:** The site requires green buffers around the primary school and White Lane Farm to protect the setting of the adjacent Moss Valley Conservation Area. Supertram safety requirements also restrict excavation within 4m of the OHLE poles along the White Lane frontage [[23](#)]. These perimeter requirements are likely to use approximately 0.4–0.5 hectares.
- **Biodiversity Net Gain:** The PEA requires a minimum 10% BNG [[24](#)]. The required open space is likely to be subject to recreational pressure and cannot safely be assumed to provide all necessary BNG units. The developer's Illustrative Masterplan recognises this by identifying separate areas for "retained and enhanced boundary planting" and a "planted buffer to the eastern boundary" [[24](#), Item 7, 15]. A realistic allowance for BNG habitat creation is approximately 0.4–0.5 hectares.

- **Site Severance and Duplicated Infrastructure:** The 30m-wide Robin Brook buffer divides the site into two separate parcels. The developer’s access appraisal indicates that this requires separate access arrangements onto White Lane. A reasonable allowance is therefore needed for duplicated access roads, turning heads and supporting infrastructure. Allowing approximately 10% of the site area for this duplicated infrastructure equates to around 1.084 hectares.

Taking these requirements together - 3.92 ha for fixed constraints and between 2.0–2.2 ha for other land requirements - the realistic net developable area is likely to fall to approximately 4.8–5.0 hectares.

9.3 Contextual density

The Council applies 40 dph because the site is within walking distance of a Supertram stop. That is a generic accessibility assumption from the HELAA that does not reflect the site-specific constraints at SS19.

This is not an ordinary urban infill site. It is a rural-edge site beside the Moss Valley Conservation Area, White Lane Farm, Robin Brook, native hedgerows and a wooded brook corridor. MM429 and the Statement of Common Ground require development to preserve the heritage setting of the Conservation Area and White Lane Farm [25, paras. 9.1–9.2]. The ecological evidence also identifies the brook corridor and hedgerows as important habitat features, providing connectivity to the wider countryside to the south and east [24, pp. 13–14].

Those constraints point towards a softer, lower-density edge-of-settlement layout, with wider buffers, more planting and a less urban form. In that context, the HELAA’s “less accessible urban location” density of 35 dph is a more appropriate assumption than the Council’s assumed 40 dph.

9.4 Realistic yield and conclusion

At the 5.0-hectare upper end of the §9.2 range, only 1.92 ha of the gross site is left for the remaining site-specific requirements - infrastructure and heritage buffers, BNG habitat creation, and the duplicated access forced by the Robin Brook severance - against an estimate of 2.0–2.2 hectares. The 5.0-hectare figure is therefore a ceiling generous to the Council, not the realistic figure.

The Council’s assumed density of 40 dph is also an urban density. In this edge-of-settlement location, affected by Robin Brook, ancient woodland, open-space requirements, SuDS, heritage setting and access duplication, a lower density of 35 dph is more appropriate. Applying 35 dph to a 4.8–5.0-hectare NDA yields **168–175 dwellings** rather than the 304 assumed.

10 MM440: SWS18 Land between Lodge Moor Road and Redmires Conduit

The Council indicates that SWS18 can deliver 258 dwellings. A realistic site-specific assessment indicates a capacity of **134–149 dwellings**.

That figure is based on a realistic net developable area (NDA) of approximately 4.45–4.95 hectares, rather than the Council’s assumed 7.36 hectares, and an appropriate rural-edge density of 30 dph, rather than the Council’s assumed 35 dph: $4.45\text{--}4.95\text{ ha} \times 30\text{ dph} = 134\text{--}149\text{ dwellings}$.

10.1 Why the Council’s assumed NDA is not realistic

The Council’s figure of 258 dwellings is based on a gross site area of 9.20 hectares and an NDA of 7.36 hectares. This applies the generic HELAA “rule of thumb” net developable ratio of 80%, leaving only 1.84 hectares for all non-housing land requirements.

That allowance is already exceeded by the site’s quantified hard constraints:

- **Exolum Pipeline Protection Zone:** Evidence from the operator requires a 12m Zone of Protection (+7m/–5m).² Across the 400m length of the onsite pipeline, this removes approximately 0.48 hectares from the developable area.
- **Mandatory BNG Watercourse Ditch:** The Preliminary Ecological Assessment confirms that improving the existing Redmires Conduit is “not realistic” due to the constraints of the existing public footpath. A new ditch is therefore required within the survey area [26, para. 6.11.3]. A 5m corridor for this ditch along the 670m southern boundary removes approximately 0.34 hectares.
- **Local Wildlife Site Buffer:** MM440 requires a 10m buffer to protect the adjacent LWS / watercourse from development. This removes approximately 0.67 hectares.
- **SuDS Attenuation:** The SFRA requires a 1.5m deep attenuation pond covering 0.42 hectares [27, p. 14]. This cannot be placed within the LWS buffer or BNG ditch without undermining their protective function.

Together, these constraints require approximately 1.91 hectares. That already exceeds the Council’s entire 1.84-hectare allowance, before any land is allowed for open space, play space, internal roads, habitat creation, National Park screening, or layout inefficiency caused by the diagonal Exolum pipeline, as shown in Figure 3 (page 37).

Further constraints also remain to be accommodated. MM440 requires structural landscape buffers to protect the Peak District National Park setting. The assessment identifies additional BNG habitat creation requirements. Figure 4 (page 37) also shows a Yorkshire Water combined sewer discharging from the Lodge Moor Hospital site, requiring either a Build Over Agreement or a buffer zone, the extent of which has not yet been quantified.

At the 4.95-hectare upper end, only 2.34 ha of the gross site remains for everything beyond the constraints described above: structural landscape buffers to the Peak District National Park,

²MM440 incorrectly specifies a 6m buffer.

additional BNG habitat creation, the Yorkshire Water sewer easement, open space, internal estate roads, and the layout inefficiency caused by the diagonal Exolum pipeline. The upper bound is therefore a ceiling generous to the Council, not the true figure.

10.2 Appropriate density

The Council assumes a density of 35 dph. However, the Statement of Common Ground confirms SWS18 is only 800m from the Peak District National Park and requires landscape buffers to protect this setting [28, paras. 9.3–9.4]. The adjacent Lodge Moor Hospital development used wide green buffers and woodland screening, and has an 11 dph gross density.

Given the site’s rural-edge location next to the National Park, the HELAA’s “rural area” density of 30 dph is a more appropriate assumption.

10.3 Conclusion

SWS18 cannot be relied upon to deliver 258 homes. Once the pipeline protection zone, BNG ditch, LWS buffer, SuDS requirement, National Park screening, sewer constraint and layout inefficiency are considered together, the Council’s assumed 7.36-hectare NDA is not realistic. Applying an appropriate rural-edge density of 30 dph to a realistic NDA of 4.45–4.95 hectares gives a capacity of **134–149 dwellings**.

11 MM441: SWS19 Land to the north of Parkers Lane

MM441 proposes to release this site based on housing need and identifies necessary mitigations, including ecological buffers and visual screening, but it does not justify the target capacity of 80 homes at approximately 35 dph. It does not demonstrate how this density of housing can be accommodated alongside mandatory buffers without harming the area's character.

This capacity also sits uneasily with the Council's recent decision on an adjacent site with comparable landscape and character constraints, rendering the proposed capacity unjustified.

This is shown by Application 22/04338/FUL (Dore Moor Garden Centre), which was refused as the Council conceded that standard policy urban density targets are inappropriate in this area. The Planning Officer concluded: "In this instance in this rural location within the Green Belt, a density to reflect the policy requirement [35 dph] would not reflect the prevailing density of the area, which is lower" [29, p. 63]. Therefore, assuming 35 dph on SWS19 contradicts this assessment. As the Dore Neighbourhood Plan identifies, the prevailing density for this specific rural-edge context is actually closer to 11 dph.

Further, MM441 mandates a minimum 6m buffer for the adjacent Local Wildlife Site, alongside landscape buffers to screen the site from the National Park. The Officer Report for the adjacent Garden Centre site highlights the severe spatial conflict between high-density development and protection of landscape character. It notes that placing buildings too close to boundaries creates "pressure to remove trees in the future" and "unacceptable living conditions" [29, pp. 80, 86].

Applying these necessary buffers to SWS19 would reduce the buildable area. Forcing 80 homes onto that smaller footprint would push the actual net density above 35 dph.

To fit 80 homes onto the remaining land, the layout would require a compressed built form. In refusing the adjacent site, the Council ruled that such a layout creates a "tight knit urban grain" that "does not reflect or reinforce the rural character of the area" [29, pp. 75]. They ultimately condemned it as an "incongruous development that represents general overdevelopment of the site" [29, pp. 75].

The Council's evidence demonstrates an incompatibility between a capacity of 80 units and the landscape, buffering, and character constraints of this location. To achieve a design that respects the prevailing rural-edge character and accommodates viable National Park and Wildlife Site buffers - as required by both MM441 and the NPPF - the capacity of SWS19 would need to be reduced.

Applying the established local density of **11 dph** to the net developable area yields a realistic, policy-compliant capacity of between **25–30 dwellings**. As proposed, the allocation of 80 units promotes severe overdevelopment, rendering the modification unsound as it is not effective.

12 MM461: CH05 Land to the east of Chapeltown Road

The claimed capacity of 549 homes is derived from the generic methodology in the HELAA. For sites over 10 hectares, that methodology applies a 30% deduction, leaving a 70% net developable area. An urban density of 40 dph is assumed.

For CH05, this generates: $19.62 \text{ hectares} \times 70\% = 13.73 \text{ hectares net} \times 40 \text{ dph} = 549 \text{ dwellings}$.

12.1 Spatial Constraints

The generic 30% deduction from the 19.62-hectare gross area provides 5.89 hectares for “open space or community facilities/other use” [16, para.4.25]. However, once the land needed for “other use” is counted, this generic deduction is insufficient to cover both basic infrastructure and the site’s more difficult constraints.

First, standard estate infrastructure and mandatory drainage will consume the vast majority of this allowance:

- **Standard Highway Infrastructure:** Standard distributor roads, pavements, and turning heads typically consume 15% to 20% of a site of this scale. Taking a conservative 15% estimate, internal highways alone will consume approximately 2.94 hectares of the gross area.
- **Drainage (SuDS):** The Level 2 SFRA calculates that the site requires a minimum of 1.48 hectares for attenuation storage, assuming no infiltration [30, tab. 3-3]. This is a hard, fixed constraint, as the promoter notes infiltration is “likely to be limited” and the SFRA’s groundwater emergence mapping confirms the highest-risk zones where infiltration SuDS “may be unsuitable” [30, sec. 4]. The surface water flow route along the western boundary must be maintained to avoid flooding the A6135.

Combined, internal roads and the minimum SuDS requirement would use around 4.42 hectares. This leaves only 1.47 hectares for all of the site’s other major constraints:

- **Air Quality and Acoustic Setbacks:** The site is bounded by the heavily trafficked A6135 to the west,³ for approximately 530m, and by a raised railway line to the north-east, for approximately 380m. Residential development cannot realistically be built to the edge of these boundaries. Even a very modest 5m internal buffer along these two edges would require approximately 0.46 hectares of land. That is almost one third of the remaining 1.47-hectare allowance, before any other requirements are counted.
- **Heritage Setting:** The Statement of Common Ground notes the requirement to protect the setting of the Grade II listed Cowley Manor [31, sec. 9]. Establishing a meaningful landscape buffer and sensitive transition zone in the northern portion of the site would further reduce the developable footprint.

³MM461 confirms that average traffic flows on the A6135 exceed 19,000 trips per day.

- **Ecological Corridors:** MM461 requires onsite ecological corridors connected to the Local Nature Recovery Network. The land required for these corridors remains uncertain, as the necessary assessments have not yet been published.

These site-specific constraints must therefore reduce the net developable area further. At a 12-hectare NDA, only 3.20 ha of the gross site is left for the A6135 and railway acoustic setbacks (which consume 0.46 ha at a modest 5m alone), the Cowley Manor heritage buffer and the ecological corridors combined. The 12-hectare upper end is a ceiling generous to the Council; a realistic working figure is closer to 11 hectares (approximately 56% net developable ratio).

12.2 Outstanding Technical Work

The reliance on generic formulas over site-specific reality is confirmed in the evidence. The Statement of Common Ground reveals that the 549 capacity figure was agreed upon *before* the crucial studies determining the true developable area were reported [31, paras. 7.7–7.8]. With key technical studies - including drainage, heritage, ecology, and air quality assessments - remaining outstanding, the 549 capacity figure is only an indicative, untested, generic estimate.

12.3 Contextual Density and Conclusion

The assumed density of 40 dph is not a site-specific planning judgment, but rather the HELAA’s generic default for sites located near a “high-frequency bus route” [3, Appendix 1]. However, relying solely on this generic transport metric is flawed because it ignores the physical reality of the site. It is a steeply-sloping, visible site, which the Council’s landscape appraisal warns has “a low capacity for absorbing development” [2, p. 59]. Forcing high-density, urban-style housing onto a sensitive site contradicts both Policy NC1’s requirement for a locally distinctive neighbourhood and the promoter’s commitment to a “landscape-led” design. Even the promoter acknowledges that “it is crucial the Council make it clear the 549 figure is indicative” [32, para. 2.27].

A landscape-led vision on a constrained site justifies a net density assumption of 35 dph rather than the generic 40 dph.

A reasonable, evidence-based working estimate must rely on a net developable area of approximately 11 to 12 hectares at a contextual density of 35 dph. The Plan’s housing supply figures should be adjusted to reflect a realistic, deliverable yield of **385–420 dwellings** for this site.

13 Conclusion

This representation is made without prejudice to our primary objection that the proposed additional Green Belt allocations should not be released from the Green Belt or allocated for development.

The site-by-site analysis above demonstrates that the Council's claimed capacities are not reliable. They remain largely derived from generic HELAA assumptions, even though the examination evidence now identifies site-specific constraints affecting developable area, density, layout efficiency, mitigation requirements and deliverability.

The scale of the issue is material. The Council claims that these additional allocations can provide 3,906 dwellings. A realistic constraint-based assessment indicates a capacity of approximately **2,385–2,672 dwellings**. That is an overstatement of approximately 1,234–1,521 dwellings, or roughly one-third to two-fifths of the claimed capacity.

This is not a marginal adjustment. The Plan's stated housing headroom is only 298 dwellings. The overstatement identified in this representation is therefore around 4–5 times the entire housing headroom. It goes directly to the soundness of the housing trajectory and the justification for Green Belt release.

The issue is not simply that the housing numbers should be adjusted downwards. It is that the allocations, the housing trajectory and the release strategy have not been shown to be justified or effective on the evidence now before the examination.

The Inspectors are therefore respectfully requested to find that the Council has not justified the assumed capacities for the proposed additional Green Belt allocations. Unless the Council can demonstrate, using proportionate site-specific evidence, that the claimed yields remain realistic and deliverable, the affected allocations should be deleted or the housing trajectory and Green Belt release strategy should be reassessed on the basis of realistic, constraint-led capacities.

Appendix A Schools and Burial Grounds Cannot Satisfy Policy NC15

It cannot be argued that the land safeguarded for the school or burial ground satisfies the 10% open space requirement under Policy NC15.

- **Typology and Accessibility:** Policy NC15 (Table 2) defines the types of open space expected for housing developments (allotments, amenity green space, parks, play space, and accessible natural green space). Burial grounds are not listed. NC15 requires open space to be publicly accessible for recreation. A multi-faith burial ground serving a city-wide need does not perform a recreational function. Similarly, school grounds feature secure boundaries, hard courts, and institutional control, rendering them inaccessible for general community recreation.
- **Infrastructure Classification:** The Council’s Infrastructure Delivery Plan (IDP) classifies both the burial ground (CF07) and schools under Community Facilities and Education, respectively. Neither is classified as “Green Infrastructure - Open Space”.
- **Permanence:** The Inspectors’ letter acknowledges the schools added to the Plan may not be required [1, para. 18]. Main modifications MM351 and MM411 state that alternative proposals in relation to this land will be considered as part of the first review of the Plan. Temporary or conditional safeguarding cannot satisfy a permanent residential open space requirement.
- **The 30% HELAA Allowance:** The Proposed Additional Sites Consultation Document assumes a 30% deduction for large sites to cover “open space or community facilities/other uses” [16, para. 4.25]. This is a plan-making capacity assumption, not a mechanism to substitute one development management requirement for another. A school may consume part of that 30% spatial allowance, but its provision does not extinguish the distinct, mandatory policy requirement to provide recreational open space under NC15.

Appendix B NES37 Quantification of Ecological Constraints

Based on the data in Appendix 3 of the Baseline BNG Assessment [33], the Preliminary Ecological Appraisal [34], and the main modifications (MM351), the physical land required for ecological retention and buffering across the allocation is calculated below.

B.1 Species-Rich Hedgerows. Applying a standard 10m buffer (5m either side) to the identified species-rich hedgerows:

- **High Distinctiveness (with trees):** 1.382km
- **Medium Distinctiveness (without trees):** 0.551km
- **Total Length:** 1.933km (1,933m)
- **Buffer Area:** $1,933\text{m} \times 10\text{m} = 19,330\text{m}^2 = \mathbf{1.93 \text{ hectares}}$

B.2 Irreplaceable Veteran Trees. EXAM 178 records 16 veteran trees, all classified as very large and marked as irreplaceable habitat. Under statutory guidance, loss is unacceptable, and they must be retained with appropriate root protection zones. Using their combined metric area equivalent provides a baseline proxy for their retention area: **1.22 hectares**.

B.3 Local Wildlife Site (LWS) Watercourse Buffers. MM351 dictates a minimum 8m buffer either side of the watercourse where it forms the adjacent LWS. Measurements of the shared boundaries and internal watercourses reveal the following minimum buffers:

- 802m along the southern boundary (8m buffer) = 0.64 ha
- 802m along the northern boundary (8m buffer) = 0.64 ha
- 190m internal segment (16m total buffer) = 0.30 ha
- 100m internal segment (16m total buffer) = 0.16 ha
- **Total Watercourse Buffer Area:** **1.75 hectares** (rounded)

B.4 Summary of Ecologically Constrained Land. The combined land take required for these three ecological elements alone is **4.90 hectares** ($1.93 + 1.22 + 1.75$). This is a conservative minimum. It does not include lowland mixed deciduous woodland blocks, or specific root protection zones that may exceed the metric area equivalents for the veteran trees.

Appendix C NES39 Detailed Constraint Analysis

C.1 Mandated Boundary Planting Retention. The Inspectors directed that policy wording must “retain and enhance planting on the eastern and western boundaries” [1, para. 15]. This instruction has been formalised in MM353. The retention and required enhancement of these features act as structural landscaping buffers, removing these corridors from the developable footprint.

C.2 Ancient Woodland/LWS Exclusion Zone. The northern boundary of Parcel A is defined by the Local Wildlife Site, which the Inspectors identified as forming the new, defensible Green Belt boundary. MM353 imposes a strict condition that a buffer of a “minimum 15 metres wide and measured from the edge of the canopy” must be maintained to protect the woodland. Because the canopy naturally extends beyond the mapped LWS boundary, this 15m exclusion zone creates an irregular constraint along the entire northern frontage of the site where no built development can occur.

C.3 Wheel Lane Access vs. Heritage Wall. A central heritage wall, dating to at least the 1790s, bisects the site. The Inspectors specifically directed the Council to “maximise retention of stone walls”, a requirement now codified in MM353. Concurrently, MM353 mandates that “access to the highway access will be required off Wheel Lane”. The conflict between an adoptable access road into the steeply sloping western portion of the site from Wheel Lane, while simultaneously maximising the retention of the dividing heritage wall, creates profound layout inefficiencies. Turning heads, gradients, and internal road hierarchies will consume a disproportionate amount of space, driving down the net developable area.

C.4 Public Open Space and Drainage. MM353 requires open space to be provided in accordance with Policy NC15. The SFRA’s required attenuation features are engineered storage basins with fluctuating water levels; they cannot safely double as the recreational open space NC15 requires. These two requirements consume separate land, displacing housing and suppressing the yield below the 90% efficiency claimed by the Council.

C.5 Sewerage Infrastructure Easement. The Infrastructure Delivery Plan identifies a 300mm combined sewer running through and alongside the site [35, p. 29]. An easement corridor must be maintained free of built development, adding another layer of constraint to the internal masterplan.

C.6 Unmitigated Ecological Risks. No formal ecological assessment has been carried out prior to this allocation. Observations by Sheffield & Rotherham Wildlife Trust have indicated the potential presence of acid grassland on the western parcel, as well as sightings of protected species including badgers, bats, and grass snakes. While formal surveys are deferred to the planning application stage, the lack of baseline data represents an unmitigated risk; any subsequent requirement for species exclusion zones or priority habitat retention will only compress the net developable area further.

Appendix D SES29 Detailed Constraint Analysis

D.1 The SuDS Deficit and Downstream Flood Risk. The Level 2 SFRA states that to manage the 1% AEP + 40% climate change event, approximately 8.0% of the total site area is required for flood storage (based on a 1.5m deep pond) [36].

Onsite attenuation at SES29 is a non-negotiable safety constraint. The site sits topographically upstream of Catcliffe, a community vulnerable to severe, well-documented recurrent flooding [20]. To prevent exacerbating this known downstream risk, the Lead Local Flood Authority (LLFA) and Environment Agency will enforce attenuation volumes. The 8.0% land-take must therefore be treated as a minimum.

Applied to the 56.40 ha gross site, the SFRA baseline mandates at least 4.51 hectares of dedicated attenuation land. The promoter’s masterplan only allocates 3.44 hectares for “Proposed Attenuation/Swales”. This leaves an immediate **1.07-hectare deficit** that must be absorbed by the residential or employment NDAs.

D.2 Railway Station Parking and Infrastructure. MM410 requires the layout to provide for a new station on the rail line, mandating “options for car parking and other ancillary access arrangements”. The promoter’s masterplan indicates a station location but fails to allocate any land for surface car parking or drop-off infrastructure. Such infrastructure is land-intensive and will draw from the residential land budget.

D.3 Mining Risk and Exclusion Zones. The constraints mapping shown in E reveals that much of the northern portion of the site is designated as a “Mining High Risk Development Area”. Three specific mine entrances are mapped within the site boundary (two in the north, one in the south). The Coal Authority mandates strict “no-build” standoff zones around mine shafts. These exclusion zones punch holes into the developable footprint, fragmenting the layout and reducing efficiency.

D.4 Archaeology and Heritage Severance. MM410 acknowledges potential archaeological impacts and mandates their mitigation through design. These are shown on the map in E that identifies multiple sub-circular structures and other archaeological remains. It also maps a Roman road bisecting the eastern half of the site from north to south. Any requirement to preserve this linear asset *in situ* will effectively sterilise a corridor straight through the primary residential zone, breaking up contiguous housing blocks and suppressing the 19.13 ha NDA.

D.5 Highways Infrastructure and Severance. The indicative access plan shows a new 4-arm roundabout and realignment of the B6066 Highfield Lane and Orgreave Lane [37]. Because this access must accommodate HGVs serving the employment zone, it requires sweeping radii. As demonstrated by the access overlay on the constraints map in E, this infrastructure cuts across existing boundaries, severing the south-eastern corner into geometrically unusable fragments that cannot support standard housing.

D.6 Ecological Buffer Compression. MM410 mandates a minimum 15m buffer to the adjacent Waverley Pond and Handsworth Tip Local Wildlife Sites. The constraints map identifies

ancient/veteran trees and native hedgerows scattered across the site. Sheffield & Rotherham Wildlife Trust have recommended a buffer of 50–100m for development sites bordering Local Wildlife Sites and ancient woodland to mitigate cumulative indirect impacts [14, p. 8]. Protecting these features creates hard internal boundaries that dictate where roads and housing blocks can be placed, limiting the density that can be achieved.

Appendix E Map of Constraints on SES29

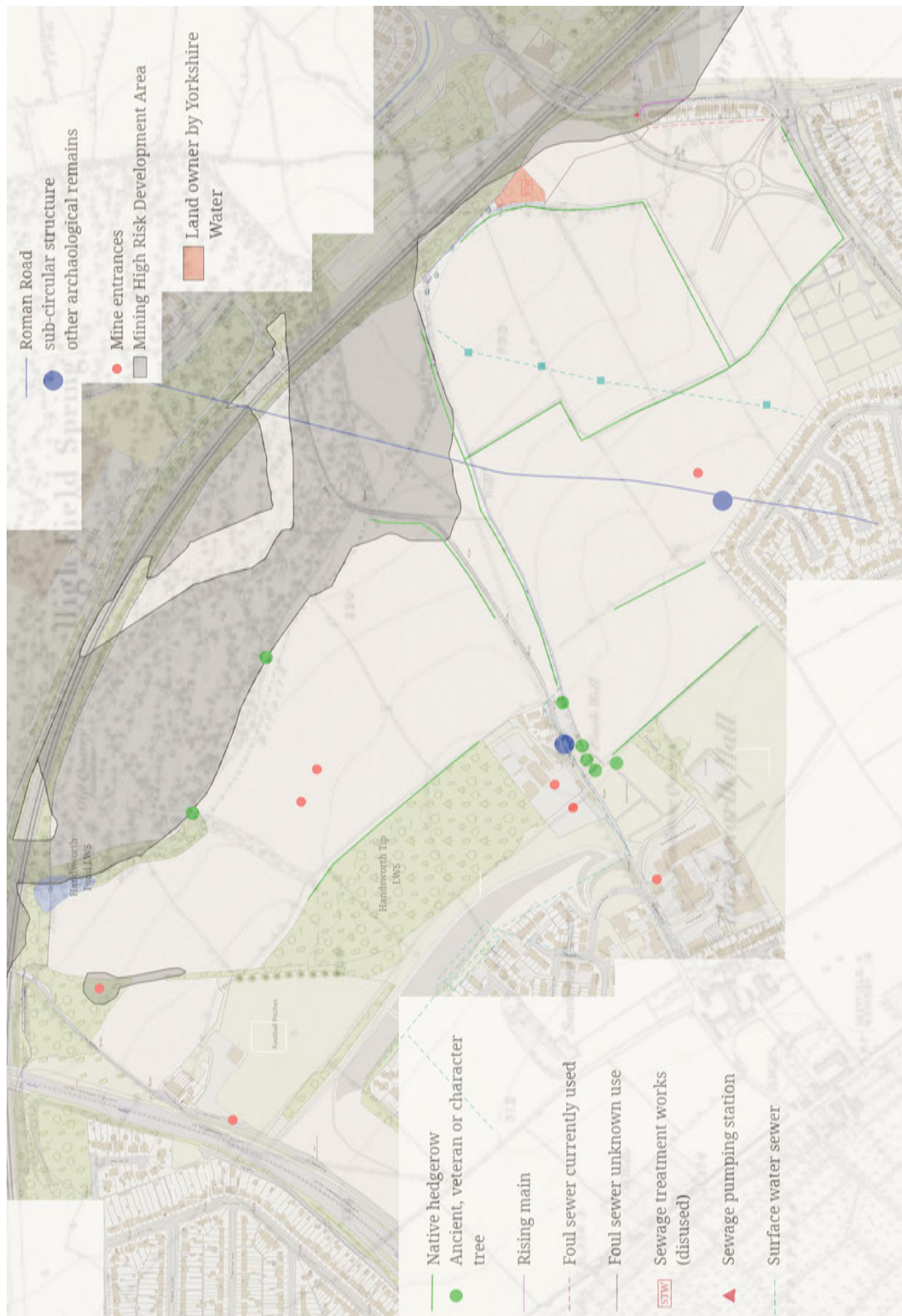


Figure 1: Map of Constraints on SES29.

Appendix F SES30 Quantification of Ecological Constraints

Using the Baseline BNG Assessment [38], the Preliminary Ecological Appraisal [39], and MM411, the physical land required for ecological retention and buffering across the allocation is calculated below.

F.1 Hedgerow Habitats. The BNG assessment identifies 3.38km of species-rich, native, and non-native hedgerow habitats [38, para.3.1.4]. Applying a standard 10m ecological buffer (5m either side) to protect these wildlife corridors: $3,380\text{m} \times 10\text{m} = 33,800\text{m}^2 = \mathbf{3.38 \text{ hectares}}$.

F.2 Irreplaceable Veteran Trees. The BNG assessment records 9 veteran trees on site [38, T20-22 & T30-35], all marked as irreplaceable habitat. To provide a consistent and robust baseline that aligns with the standard 15m buffer applied to ancient woodland, a uniform 15m radius from the centre of each trunk has been assumed for their mandatory root protection retention area.

The protection buffer for a single veteran tree is calculated as being $\pi \times (15\text{m})^2 \approx 707\text{m}^2$.

Aggregating for all 9 recorded veteran trees provides the combined metric area equivalent. This serves as the baseline proxy for the site's non-developable irreplaceable habitat, i.e., $9 \times 707\text{m}^2 \approx 6,363\text{m}^2$ or **0.64 hectares**.

It should also be recognised that the veteran trees identified in the site's BNG assessment do not correlate or overlap with the veteran tree records held on the Woodland Trust's Ancient Tree Inventory of the area [40]; the true number and spatial extent of veteran trees across the site remain unverified. Because these datasets capture different specimens, it is probable that the actual irreplaceable habitat area required to protect all veteran trees on site will cumulatively exceed the baseline of 0.64 hectares.

F.3 LWS and Watercourse Buffers. MM411 dictates a minimum 15m buffer to the adjacent Smelter Wood, Shirtcliffe Valley Grasslands, and Shirtcliffe Woods & Fields Local Wildlife Sites, which share a 1.3km boundary with the site. The Level 2 SFRAs mandate an 8m no-development buffer either side of the watercourse/wildlife corridor that bisects the site. This has been mapped at a conservative 820m.

- **LWS Buffer Area:** $1,300\text{m} \times 15\text{m} = 19,500\text{m}^2 = \mathbf{1.95 \text{ hectares}}$
- **Watercourse Buffer Area:** $820\text{m} \times 16\text{m} = 13,120\text{m}^2 = \mathbf{1.31 \text{ hectares}}$
- **Total Buffer Area:** $1.95\text{ha} + 1.31\text{ha} = \mathbf{3.26 \text{ hectares}}$

F.4 Summary of Ecologically Constrained Land. The combined land take required for these three ecological elements alone is **7.28 hectares** ($3.38 + 0.64 + 3.26$). This is a conservative minimum and does not account for the additional veteran trees and internal green corridors required by MM411.

Appendix G SS19 Robin Brook Buffer Constraints

G.1 Ecological Evaluation and Ancient Woodland Status. Recent springtime surveys conducted by the Moss Valley Wildlife Group (MVWG) have demonstrated that the Preliminary Ecological Appraisal (PEA) commissioned by Sheffield City Council failed to identify key ecological features of the site. MVWG’s new evidence indicates that the Robin Brook linear woodland is very likely ancient woodland.

G.2 Precedent for Canopy-Edge Buffer Measurement. A review of 22 other main modifications for site allocations across the local plan confirms standard practice for woodland buffer measurements. In all 22 cases, the policy wording states that the 15-metre minimum buffer for “woodland” must be “measured from the edge of the canopy”. Examples of similar sites where this requirement has been established include:

- MM318 – Site NWS02
- MM333 – Site NES01
- MM355 – Site ES01
- MM388 – Site SES02
- MM415 – Site SS06
- MM443 – Site SD01

Across these comparable allocations, “woodland” and ancient woodland are bracketed together, meaning the 15m minimum canopy-edge measurement applies uniformly. In several modifications, the word “minimum” was inserted as a new modification to strengthen the protection. While these examples often appear in the context of a Local Wildlife Site, the wording itself consistently establishes that it is the presence of the “woodland” that requires the canopy-edge buffer.

G.3 Physical Site Measurements for Robin Brook. Applying this established methodology to Robin Brook increases the required standoff distance. Physical measurements taken from the centre of the brook demonstrate the following:

- **Canopy Spread:** On both the northeast and southwest sides of the brook, the edge of the tree canopy extends a conservative 9 metres (and likely closer to 10 metres) from the centre of the watercourse. The physical characteristics vary - the northeast bank is narrow and steep but has a wide canopy, while the southwest side has a wider bank but a narrower canopy. In both cases, however, the 9-metre canopy parameter applies.
- **Total Required Buffer:** Adding the policy-compliant minimum 15-metre buffer to the 9-metre canopy edge establishes a required buffer of 24 metres from the centre of the brook on each side.
- **Site Impact:** This creates a minimum housing-exclusion zone of 46 metres, including the brook itself, running across the lower central part of the site.

G.4 Geospatial Mapping and Developable Area Impact. The S12 Action Group has translated these measurements into a formal geospatial map, shown in Figure 2. Mapping the

required 24-metre buffer along the length of Robin Brook confirms that this single constraint removes **1.917 hectares** from the site's developable area.

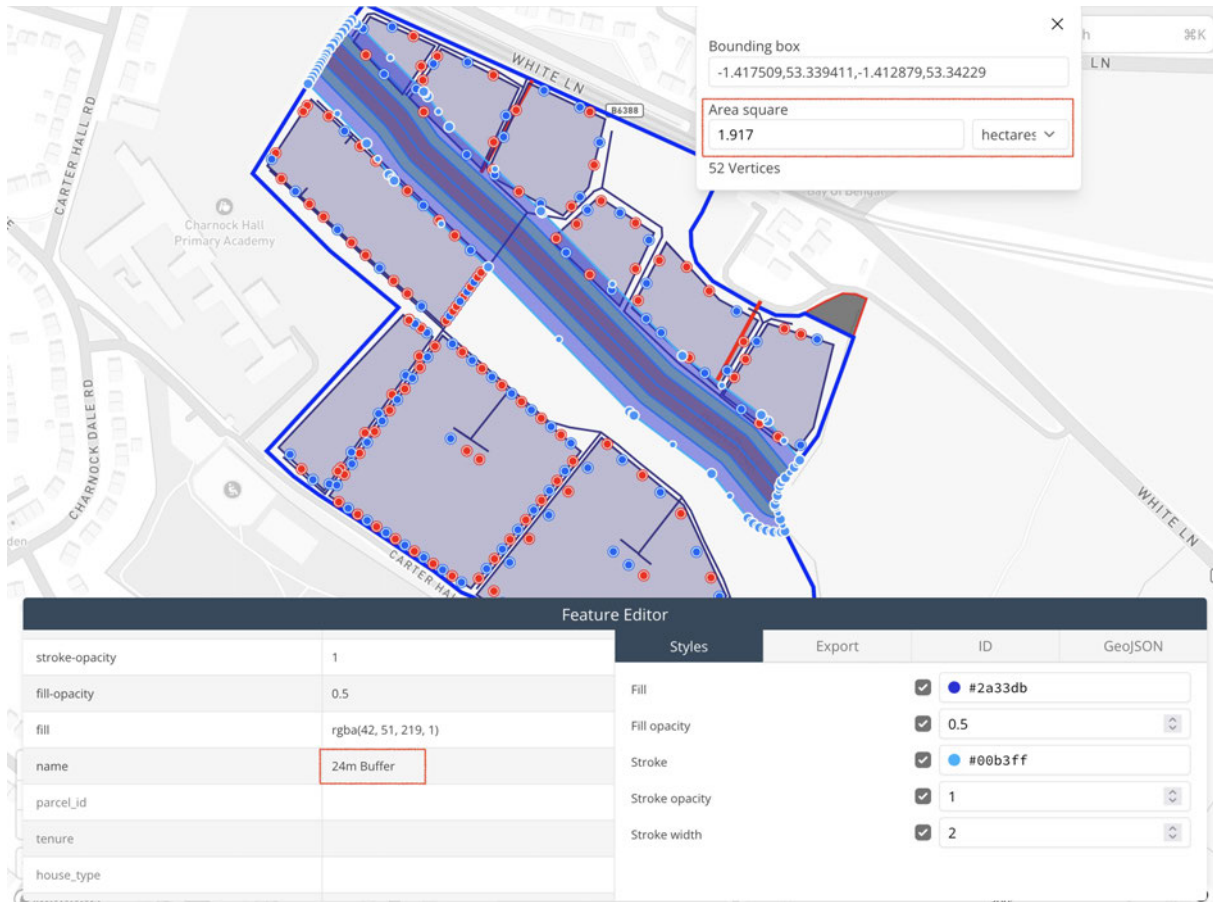


Figure 2: Geospatial mapping of SS19.

Appendix H Maps of SWS18 Constraints

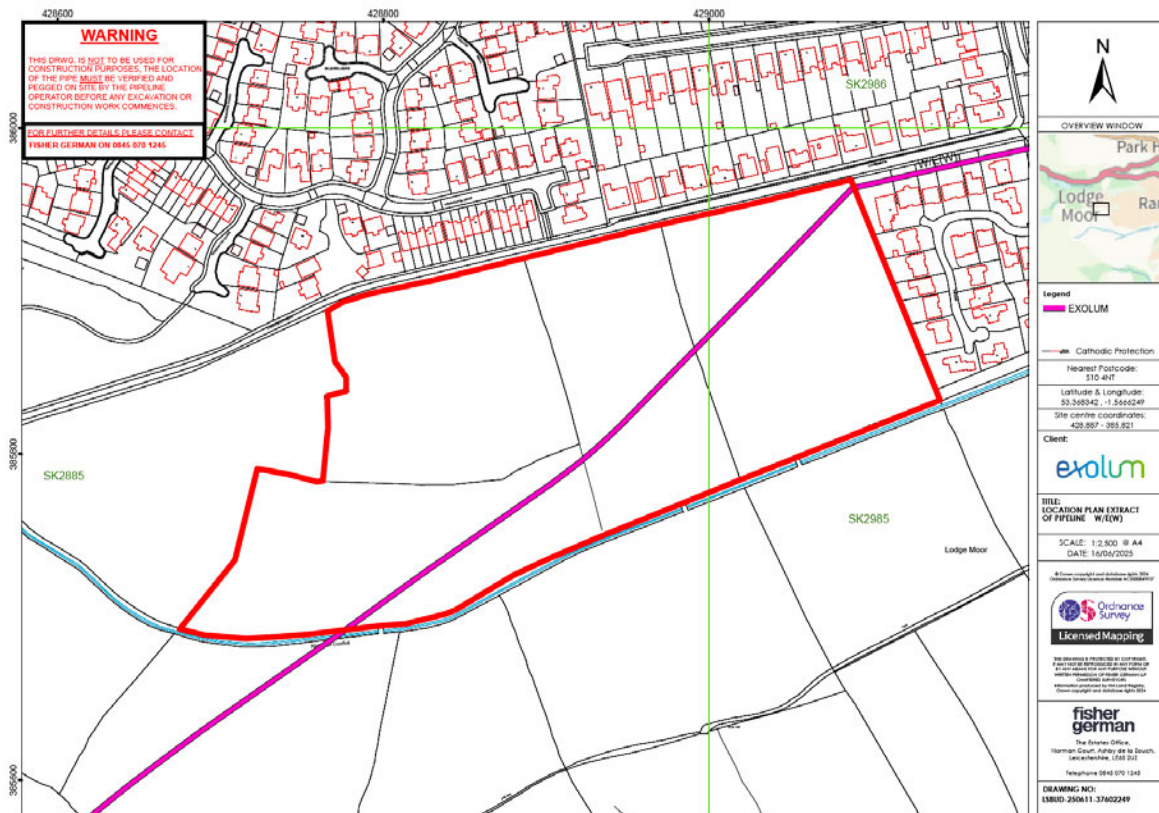


Figure 3: Location of the Exolum pipeline as it runs across SWS18 [41].

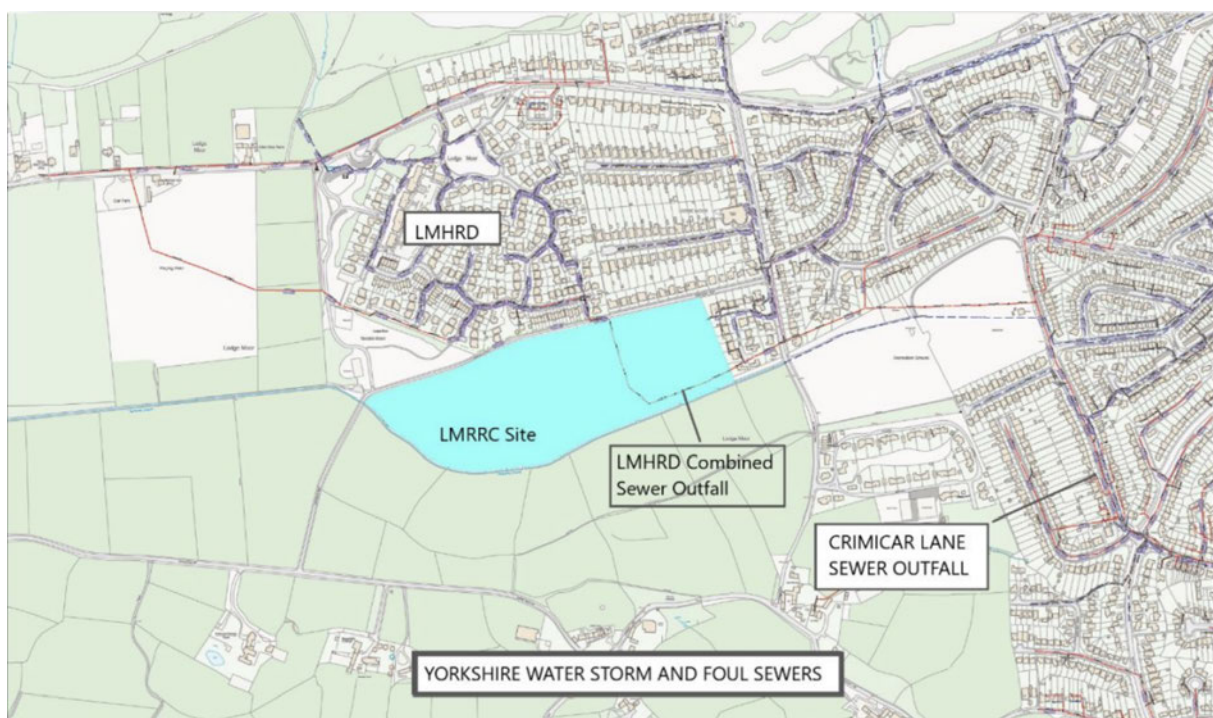


Figure 4: Location of the Yorkshire Water combined sewer on SWS18.

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