

## Sheffield Plan Main Modifications

### Responses – by email

#### Reference numbers REF5.0301 to REF5.0350

<b>Reference Number</b>	<b>Respondent Name</b>	<b>Organisation</b>
REF5.0301	Ian Montgomery	Individual
REF5.0302	Amber	Individual
REF5.0303	Julie Goude	Individual
REF5.0304	Steve Froggatt	Individual
REF5.0305	Nicola Brady	Individual
REF5.0306	Ryan Palmer	Individual
REF5.0307	Theresa Montgomery	Individual
REF5.0308	Reg Parsisson	Individual
REF5.0309	Kim Palmer	Individual
REF5.0310	Phil Corker	Individual
REF5.0311	P. Nigel Brady	Individual
REF5.0312	Andrew Webster	Individual
REF5.0313	Smelt Family	Individual
REF5.0314	Sue Smelt	Friends of Shirtcliffe Valley
REF5.0315	Charlotte Pinder	Individual
REF5.0316	Joanne & Ian Ward	Individual
REF5.0317	Carol Simcox	Individual
REF5.0318	Mr & Mrs Jackson	Individual
REF5.0319	Alex Radford	Individual
REF5.0320	Alison Broadhead	Individual
REF5.0321	Ann Thompson	Individual
REF5.0322	Rob Purseglove	Individual
REF5.0323	Sarah Purseglove	Individual
REF5.0324	Bec Nutton	Individual
REF5.0325	Denise & Alan Casbolt	Individual
REF5.0326	Noelle Register	Individual
REF5.0327	Mark Ash	Individual
REF5.0328	Wayne Bond	Individual
REF5.0329	Andrew & Olwen Robinson	Individual
REF5.0330	Michael Yates	Individual
REF5.0331	Alex Hobson	Individual
REF5.0332	Emma Ozenbrook	Individual
REF5.0333	Pamela Robinson	Individual

<b>REF5.0334</b>	Paul Talbot	Individual
<b>REF5.0335</b>	Nicola Ley	Individual
<b>REF5.0336</b>	Rachel Develin	Individual
<b>REF5.0337</b>	Bec Nutton	Individual
<b>REF5.0338</b>	Bec Nutton	Individual
<b>REF5.0339</b>	John & Sue Warwick	Individual
<b>REF5.0340</b>	Roxanne Myles	Individual
<b>REF5.0341</b>	Nicola Bates	Individual
<b>REF5.0342</b>	Emma Siddall	Individual
<b>REF5.0343</b>	Charlotte Corker	Individual
<b>REF5.0344</b>	Terri McAlpine	Individual
<b>REF5.0345</b>	Glen Charlesworth	Individual
<b>REF5.0346</b>	Ammarah Hassanjee	Individual
<b>REF5.0347</b>	Timothy Goddard	Individual
<b>REF5.0348</b>	Julie Harris	Individual
<b>REF5.0349</b>	Luke Eccleston	Individual
<b>REF5.0350</b>	Liam Cross	Individual

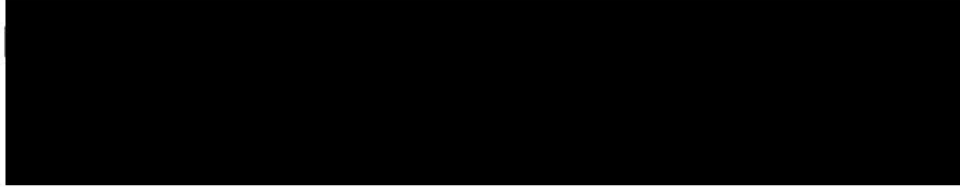
**REF5.0301**

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

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**From** [REDACTED]  
**Date** Mon 2026-05-04 3:27 PM  
**To** SheffieldPlan <sheffieldplan@sheffield.gov.uk>



Dear Sir/Madam,

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

This objection is specifically on the grounds that these Main Modifications are unsound, as there is no clear or deliverable plan for the infrastructure required to support the proposed development, particularly in relation to healthcare provision.

From my own experience, local GP services are already under significant pressure. It is often very difficult to get an appointment, with long waits and not enough doctors to meet current demand. On occasions, patients are directed to A&E due to lack of GP availability, but this results in waiting times of 12–15 hours, which is clearly not sustainable.

More broadly, local services are already overstretched, and I do not see any credible or detailed plan showing how this development would be supported. Traffic in the area is already very busy at rush hour, and the loss of Green Belt land would remove valuable space that is currently used for walking and cycling, as well as providing relief from congestion.

There is no clear evidence that the necessary infrastructure—especially healthcare—can be delivered in step with development. Without this, the proposals cannot be considered sound.

For these reasons, I respectfully request that sites included under MM410 (SES29) and MM411 (SES30) are removed from the plan and remain designated as Green Belt.


Yours faithfully,  
Ian Montgomery

Sent from my iPhone

**REF5.0302**

## Objection to MM410 and MM4

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From   
Date Mon 2026-05-04 3:33 PM  
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>



Dear Sheffield city council,

I am writing to object against the building of houses on the green belt surrounding Handsworth and woodhouse Sheffield. For so many reasons I ask you build else where and consider what so many locals are asking. Local people do not want the pollution of new builds and more cars on the road. The wildlife will loose their home. The GP surgeries already are at capacity. Local schools don't have enough space as it is. Building up to 2000+ homes will ruin everything people love about this area. Hedgehogs are already on the decline and losing their habitats why can an alternative site not be used? Taking up so many trees will ruin the air quality. Why should nature reserves only be places owned by the rich with paid car parks miles away. Children should be able to see nature and study the creatures and plants that grow there. To uproot so many animals, insects and plants will have a knock on effect on the eco system. Rodents will seek shelter in homes as they always have and where will the ground nesting birds go? How many creatures will die when the digging starts? How safe is it for the surrounding homes built on top of old mines, will the digging disrupt the land and risk the surrounding homes structural integrity? There's land on the Dyke vale road that has sat empty for years after houses were knocked down that could hold so many houses with bus routes already there that would be a better solution than to take up so much land.

Kind regards Amber

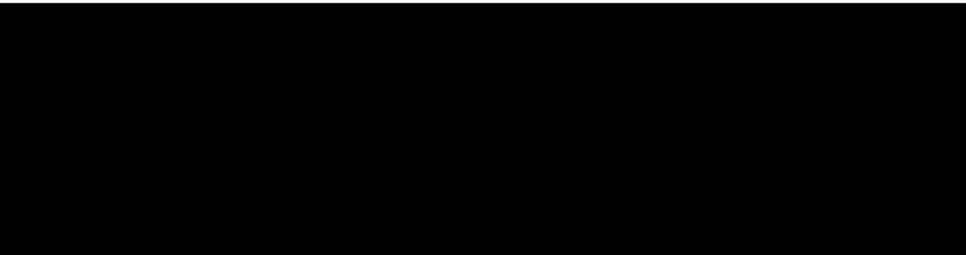
**REF5.0303**

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

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**From** [REDACTED]  
**Date** Mon 2026-05-04 3:36 PM  
**To** SheffieldPlan <sheffieldplan@sheffield.gov.uk>



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 purposed 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

Julie Goude



**REF5.0304**

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**Modification reference MM411 (SES30)**

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**From** [REDACTED]  
**Date** Mon 2026-05-04 3:36 PM  
**To** SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

[REDACTED]

To whom it may concern.

Having previously sent a lengthy objection to the proposed Local plan I am again writing to object to the so called modification for SES30.

Where do I start?

The road system.

MM411 once again does not take into consideration the amount of traffic already travelling past the site in both mornings and afternoons.

Beaver Hill Road can be at a standstill all the way from Woodhouse and then onto Retford road all the way up to the parkway most weekdays. The new traffic lights on the junction of Retford Road and Rotherham Road have made congestion even worse, from both directions. How can adding even more vehicles be anything but dangerous and polluting?

Also, the proposed new entrances are quite ridiculous. The reason other sites have been turned down due to parked cars and narrow entrances still apply to Beaver Hill and the Bramley estate so why have these been ignored?

Natural habitat.

The fields in question have a huge array of flora and fauna, we have miles of ancient hedgerows that would be wiped out, most of which also have Bluebells growing amongst them. Are these not protected under the Wildlife and Countryside act?

As I write this we have at least six breeding pairs of Skylarks on the fields, some look to already have youngsters. Again, these are on the RSPB's Red list and are also protected under the above Wildlife act. Of course when / if the fields are properly surveyed they will no doubt pick a time of year when these birds have fledged....

One of the main reasons for the modification is due to the complete lack of due diligence carried out by Sheffield council planners. How could they include land that they don't own? This begs the question, how much time and effort has actually been spent investigating the site and its complexity?

And finally, the buffer zone around said fields, ancient hedgerows, streams and Shirtcliff woods is wholly inadequate.

The fields ..

As these fields have been used for centuries as arable farmland and DEFRA predict them to be amongst the best and most viable farmland in the area wouldn't it be a travesty to build on when we should be protecting

the nations food security?

The loss of Greenbelt.

EXAM 197 states that there could be improvements to the entrance to Shirtcliffe valley and Flockton park. How in any way will this possibly alleviate the destruction of the fields and their habitat?

As a resident of S13 I have walked these fields and paths for countless years. How a new entrance to the woods will help is beyond contempt for the local community. It takes me three minutes to walk from my house to the field entrance and two more to be out of the sound of traffic. These fields are our sanctuary from the modern world.

Apparently nowhere in Sheffield is more than half an hour from the Peak District. Why do I need to get in the car and drive, adding more pollution, when I can walk across a road and be straight into nature?

Housing.

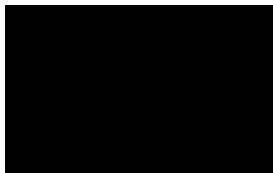
Sheffield council have not taken into consideration the huge impact the Waverley estate has had on the local infrastructure and environment. There are over 2000 houses a stones throw from Handsworth. The school on said estate is full, the local doctors and dentist at both Handsworth and Woodhouse are already oversubscribed, how can adding thousands more people do anything but exacerbate the problem?

The planners don't seem to have taken any of this into consideration and I personally wonder if they are even qualified to do their jobs!!

In summary, this site needs to be removed completely from the local plan. It has been a panic addition by the planners who have not done due diligence, just hoped we wouldn't put up a fight.

Thank you for your time.

Steve Froggatt



Sent from my iPad

**REF5.0305**

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

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**From** [REDACTED]  
**Date** Mon 2026-05-04 3:37 PM  
**To** SheffieldPlan <sheffieldplan@sheffield.gov.uk>



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

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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

Nicola Brady

**REF5.0306**

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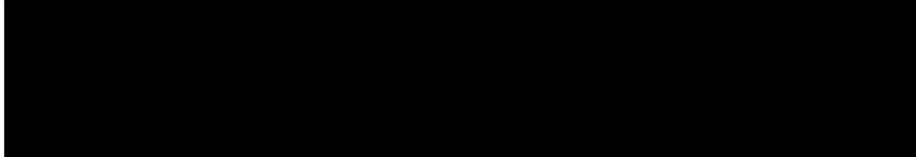
## Objection to the Proposed Main Modifications to the Sheffield Local Plan- site SS19

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From 

Date Mon 2026-05-04 3:38 PM

To SheffieldPlan <sheffieldplan@sheffield.gov.uk>



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,

Ryan Palmer

**REF5.0307**

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

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**From** [REDACTED]  
**Date** Mon 2026-05-04 3:39 PM  
**To** SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

[REDACTED]

Dear Sir/Madam,

This objection is specifically on the grounds that these Main Modifications are unsound, as there is no clear or deliverable plan for the infrastructure required to support the proposed development, particularly in relation to healthcare provision.

From my own experience, local GP services are already under significant pressure. It is often very difficult to get an appointment, with long waits and not enough doctors to meet current demand. On occasions, patients are directed to A&E due to lack of GP availability, but this results in waiting times of 12–15 hours, which is clearly not sustainable.

More broadly, local services are already overstretched, and I do not see any credible or detailed plan showing how this development would be supported. Traffic in the area is already very busy at rush hour, and the loss of Green Belt land would remove valuable space that is currently used for walking and cycling, as well as providing relief from congestion.

There is no clear evidence that the necessary infrastructure—especially healthcare—can be delivered in step with development. Without this, the proposals cannot be considered sound.

For these reasons, I respectfully request that sites included under MM410 (SES29) and MM411 (SES30) are removed from the plan and remain designated as Green Belt.

Yours faithfully,  
Theresa Montgomery

Sent from my iPhone

**REF5.0308**

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

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**From** [REDACTED]  
**Date** Mon 2026-05-04 3:40 PM  
**To** SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Strategic Planning Team

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

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

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

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

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

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

realised in a consistent, sustainable, or timely manner.

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

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

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

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

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

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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

Reg Parsisson

**REF5.0309**

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

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From [REDACTED]  
Date Mon 2026-05-04 3:41 PM  
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

[REDACTED]  
Dear Strategic Planning Team,

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

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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,

Kim Palmer.

**REF5.0310**

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

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From [REDACTED]  
Date Mon 2026-05-04 3:41 PM  
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

[REDACTED]

Dear Strategic Planning Team,

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

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

I therefore set out below my objections to specific modifications.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

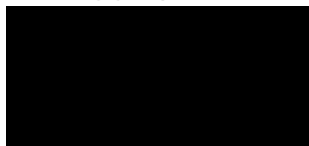
This fails to align with paragraph 42 of the NPPF which states that 'the more issues that can be resolved at pre-application stage, including the need to deliver improvements in infrastructure and affordable housing, the greater the benefits'.

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

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

Yours sincerely,

Phil Corker



**REF5.0311**

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

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**From** [REDACTED]  
**Date** Mon 2026-05-04 3:43 PM  
**To** SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Strategic Planning Team

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

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

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

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

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

realised in a consistent, sustainable, or timely manner.

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

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

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

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

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

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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

P. Nigel Brady

**REF5.0312**

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## Sheffield Plan Consultation on Main Modifications

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From [REDACTED]  
Date Mon 2026-05-04 3:55 PM  
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Planning Inspector,

I wish to make a representation on the main modifications to the Sheffield plan in particular the site NWS31.

Amongst the many factors that affect the viability of building on this site is the fact that this site is a well used natural green space that provides connections to Glen Howe park, Storth Lane and other areas of Wharncliffe Side which include Hill Top and Onesacre.

It is also well known in the area that the drainage on this field is not good large parts of this field have been severely waterlogged in the recent past and this is not just confined to the field but the whole village which may be due to the existence of underground streams and the mainly clay soil this has actually led to the closure of the community centre.

The site is yet to be assessed in respect to climate change and there has recently been environment agency funded tree planting as an aid to drainage on this site, which to me is an admittance of the existing drainage problems on the site.

Any modifications should include for a full assessment of the groundwater, drainage and possible underground streams before the site is released for development.

I am sure that better alternatives exist which would remove NWS31 from the allocation and concentrate on the development of one of the large windfall sites or opportunity sites in the main modifications, the fact that these are mentioned in the plan means they have already been identified as available.

I am sure that more brownfield sites will become apparent if the council make another call for sites which they have said they are going to do.

I do hope that all residents concerns will be considered and treated fairly in respect of this matter.

Yours Sincerely  
Andrew Webster (resident of Wharncliffe Side)


Sent from my iPhone

**REF5.0313**

**Response to Main Modifications MM411**

---

**From** [REDACTED]  
**Date** Mon 2026-05-04 4:06 PM  
**To** SheffieldPlan <sheffieldplan@sheffield.gov.uk>

 1 attachment (24 KB)  
FAMILY RESPONSE.docx;

External email

Please find as attached



30<sup>th</sup> April 2026

With reference to the main modifications for the S13 site MM411 (SES30), I do not believe the required tests that the inspector must apply have been met, therefore the proposals are unsound.

Whilst Sheffield City Council's (SCC) Main Modifications seeks to strengthen policy wording relating to ecology, buffers and mitigations, by **their own** assessment the modified plan is worse for the environment particularly in relation to indirect impacts. These are SCC conclusions based on **their own** evidence which is set out in Integrated Impact Assessment (IIA) Non-Technical Summary, page 16.

I do not believe these changes resolve the fundamental constraints affecting this site. In particular the allocation remains **inconsistent** with National Policy concerning **irreplaceable habitats** and fails to demonstrate that development can be delivered without causing unacceptable harm.

The proposed modifications refer to buffer zones but rely only on minimum distances rather than site specific ecological evidences. Standing advice from Natural England indicates that minimum buffers of 15mtr are often **insufficient**, particularly for residential development such as submitted for SES30, whilst larger buffers are required to address indirect impacts. Sheffield & Rotherham Wildlife Trust have recommend that no less than 50mtr is acceptable across this whole site.

SES30 lies immediately adjacent to areas of Ancient Woodland and identified Local Wildlife Sites and includes features such as veteran trees which are continually being recorded on the Ancient Tree Inventory at the Woodland Trust (WT), and species rich hedgerows which are likely to qualify as irreplaceable habitat. Some of these have been identified in the SCC commissioned report by Cura Terrae as being important at Local **and** County Level.

Although the buffer zones around hedgerows are less specific, the hedgerows enclosing what SCC ignorantly describe as 'the unnamed watercourse' fails to acknowledge that this specific site functions as a **highly active and diverse wildlife corridor** (irrefutable evidence can be provided as previously offered). This must surely raise the **importance** of this area and is proof that the minimum suggested buffer of 8mtr on either side of the watercourse is totally unacceptable. The hedgerows at this location are likely to contain notable, veteran or other worthy trees and information in support of this has been submitted to the WT. It is wrong to proceed with plans to develop this site until all such information has been scrutinised.

The National Planning Policy Framework (NPPF) states that development resulting in the loss, or deterioration of irreplaceable habitats should be **refused** unless there

are **wholly exceptional** reasons for building, and suitable compensation strategies must be applied. These modifications do not come close to demonstrating that such **wholly exceptional** reasons for development at this site exist.

SES30 is allocated is for general housing which National Policy and appeal decisions have consistently found does not meet this threshold.

Given the perilous proximity of SES30 to Ancient Woodland, it is highly likely there will be increased recreational pressure, lighting, noise, hydrological and other impacts on this site yet the allocation continues to underestimate **indirect effects** on the adjacent Ancient Woodland which will result in :

- Increased public access and disturbance
- Domestic pets impacting on wildlife
- Air, light and noise pollution which will be devastating for our bat colonies
- Changes to drainage and soil quality

Such impacts are specifically highlighted in National Guidance but **will not** be adequately resolved through the proposed modifications. SCC's own report suggests that harms can be avoided but the detail as to how this can be achieved is extremely vague. The facts remain that without such site specific evidence the plan **cannot** conclude that harm will be avoided and how.

The Mitigations Development Plan will **not be available until a full 12 months** after the Local Plan has been adopted. Reliance on future assessments undermines the soundness of the plan and the main modifications proposed rely on future surveys and mitigation strategies at the planning stage. This defers resolution of a fundamental constraint and yet National Policy requires that allocations are sound at the planning stage and not dependent on uncertain mitigations = **UNSOUND**

Without this it is clear there remains insufficient evidence that this is a thorough and robustly developed plan with little or no evidence to show that it is realistically deliverable in practice. The inspectors have previously stated that these sites are '**potentially**' deliverable but where is the evidence?

There is uncertainty about the full ecological value of the site including whether other on-site features also constitute Ancient Woodlands, additional ancient/species rich hedgerows or priority habitat. In such circumstances National Policy requires that a **precautionary approach** must be taken. Allocating the site in the absence of complete and robust ecological assessments risks pre-judging the outcome of planning applications = **UNSOUND**

In conclusion, I would like to state that this Local Plan and it's suggested Main Modifications are:

**Unsound** as the tests have not been met that the inspectors **must** apply

**Unjustified** due to a lack of robust evidence being provided in support of the development

**Ineffective** as this is not workable in practice and the allocation is likely to be considerably reduced

**Inadequate** best describes the woeful mitigations suggested

**Unviable** due to being financially unrealistic with a fanciful delivery plan in terms of numbers and timescale

**Therefore I request that site SES30 be removed from the plan and retain it's green belt status.**

**I also request to be notified of the final report and adoption of the plan.**

#### ADDENDUM

I would like to say what an absolute shambles this entire process has been and that the hearings were a sham designed to try to convince the community that their democratic views were being given consideration. Despite SCC's incompetence around the Street Trees debacle and the subsequent Lowcock Report it's clear that absolutely nothing has been learned. The recent instalment of a plaque in acknowledgement of the Street Trees Action Group is at best in very poor taste and demonstrates there is no level of hypocrisy to which this council cannot fall. In the view of the general public the standing of the council could not be much lower and a great many people have no trust, respect or belief in Sheffield City Council or it's current leader, Tom Hunt.

Yours The Smelt Family

**REF5.0314**

**Response to Main Modifications MM411**

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**From** [REDACTED]  
**Date** Mon 2026-05-04 4:09 PM  
**To** SheffieldPlan <sheffieldplan@sheffield.gov.uk>

 1 attachment (17 KB)  
FOSV OBJECTION .docx;

External email

Please find as attached



4<sup>th</sup> May 2026

**REGARDING SES30, MM411**

To whoever it may concern.

We write to object to the main modifications set out for the S13 site MM411 (SES30) as we do not believe the required tests that the inspector must apply have been met. It is our belief these proposals remain unsound for multiple reasons but we wish to concentrate here on the very real threat of damage being caused to the Ancient Woodland.

The edge of the woodland adjacent to the proposed development area displays clear indications of ecological sensitivity. There are mature ivy-clad trees, deadwood, uneven natural ground conditions and diverse ground flora abundant with Ancient Woodland indicator species.

These characteristics are consistent with long established woodland ecosystems which are highly sensitive to change and slow to recover from the type of disturbance they are being threatened by, and yet, there is no acknowledgment in Sheffield City Councils (SCC) Main Modifications about how these risks will be addressed. MM411 seeks to strengthen policy wording relating to ecology, buffers and mitigations but by the council's own assessment the modified plan is worse for the environment especially where indirect impacts are concerned. These conclusions are based on SCC own evidences set out in Integrated Impact Assessment, Non-Technical Summary, pge 16.

The site boundary abuts areas of steeply sloping woodland which creates significant risk that any development here will alter natural drainage patterns resulting in increased water run-off, erosion of soil and alter the nutrient rich soil in the Ancient Woodland. These factors are known to result in the deterioration of Ancient Woodland Habitats.

A 15mtr buffer is a minimum standard – there are no fixed or sufficient distances which can be applied in all circumstances. Given the steeply sloping topography and existence of only partial scrub along the Ancient Woodland edge which is already under pressure from walkers, cyclists and runners, 15mtr at this location will not prevent harmful and indirect effects. The main modifications do not show how damage will be avoided, and this is at conflict with National Planning Policy for Ancient Woodland and should therefore be refused.

Furthermore if private gardens were to lie at the edge of any proposed buffer zone, damage caused by long term impacts would be exacerbated through encroachment, vegetation clearance and unmanaged access which again renders the plan and the main modifications set out to be unsound.

The Environment Act requires SCC to show how a 10% net gain in biodiversity will be achieved for SES30 yet they have failed to do so. The ecological assessment undertaken by the council suggested that the site could be used for natural biodiversity schemes instead of housing development – a very valid point which they have chosen to ignore. No protected species surveys were undertaken before the site was allocated, yet we have direct and irrefutable evidence of the magnificent flora and fauna which have made their homes at this location.

Evidence is available and has been offered in support of the community objections but there have been no requests made to date to view this.

The compensatory improvements which have been suggested refers to potential improvements around rights of way in the local area such as Shirtcliffe Valley – Friends of Shirtcliffe Valley are against these suggestions. We consider that MM411 has not improved the soundness of the plan which continues to lack signs of being positively prepared, remains unjustified, will not be effective and is still totally inconsistent with National Policy.

Members of our group retain significant concerns about the process in general. We do not believe that the community have been afforded the respect they deserve, neither have their views been heard or their concerns addressed as they should have been.

*We therefore request that site SES30 be removed from the Local Plan and retain it's green belt status.*

*Additionally we request to be notified of the final report and adoption of the plan.*

For and on behalf of Friends of Shirtcliffe Valley

Sue Smelt Acting Chairperson

(No subject)

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**From** [REDACTED]  
**Date** Tue 2026-05-05 11:26 AM  
**To** [REDACTED]  
**Cc** SheffieldPlan <sheffieldplan@sheffield.gov.uk>

 1 attachment (17 KB)  
FOSV OBJECTION .docx;

External email



4<sup>th</sup> May 2026

**REGARDING SES30, MM411**

To whoever it may concern.

We write to object to the main modifications set out for the S13 site MM411 (SES30) as we do not believe the required tests that the inspector must apply have been met. It is our belief these proposals remain unsound for multiple reasons but we wish to concentrate here on the very real threat of damage being caused to the Ancient Woodland.

The edge of the woodland adjacent to the proposed development area displays clear indications of ecological sensitivity. There are mature ivy-clad trees, deadwood, uneven natural ground conditions and diverse ground flora abundant with Ancient Woodland indicator species.

These characteristics are consistent with long established woodland ecosystems which are highly sensitive to change and slow to recover from the type of disturbance they are being threatened by, and yet, there is no acknowledgment in Sheffield City Councils (SCC) Main Modifications about how these risks will be addressed. MM411 seeks to strengthen policy wording relating to ecology, buffers and mitigations but by the council's own assessment the modified plan is worse for the environment especially where indirect impacts are concerned. These conclusions are based on SCC own evidences set out in Integrated Impact Assessment, Non-Technical Summary, pge 16.

The site boundary abuts areas of steeply sloping woodland which creates significant risk that any development here will alter natural drainage patterns resulting in increased water run-off, erosion of soil and alter the nutrient rich soil in the Ancient Woodland. These factors are known to result in the deterioration of Ancient Woodland Habitats.

A 15mtr buffer is a minimum standard – there are no fixed or sufficient distances which can be applied in all circumstances. Given the steeply sloping topography and existence of only partial scrub along the Ancient Woodland edge which is already under pressure from walkers, cyclists and runners, 15mtr at this location will not prevent harmful and indirect effects. The main modifications do not show how damage will be avoided, and this is at conflict with National Planning Policy for Ancient Woodland and should therefore be refused.

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The Environment Act requires SCC to show how a 10% net gain in biodiversity will be achieved for SES30 yet they have failed to do so. The ecological assessment undertaken by the council suggested that the site could be used for natural biodiversity schemes instead of housing development – a very valid point which they have chosen to ignore. No protected species surveys were undertaken before the site was allocated, yet we have direct and irrefutable evidence of the magnificent flora and fauna which have made their homes at this location.

Evidence is available and has been offered in support of the community objections but there have been no requests made to date to view this.

The compensatory improvements which have been suggested refers to potential improvements around rights of way in the local area such as Shirtcliffe Valley – Friends of Shirtcliffe Valley are against these suggestions. We consider that MM411 has not improved the soundness of the plan which continues to lack signs of being positively prepared, remains unjustified, will not be effective and is still totally inconsistent with National Policy.

Members of our group retain significant concerns about the process in general. We do not believe that the community have been afforded the respect they deserve, neither have their views been heard or their concerns addressed as they should have been.

*We therefore request that site SES30 be removed from the Local Plan and retain it's green belt status.*

*Additionally we request to be notified of the final report and adoption of the plan.*

For and on behalf of Friends of Shirtcliffe Valley

Sue Smelt Acting Chairperson

**REF5.0315**

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## Objection site MM411

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From [REDACTED]  
Date Mon 2026-05-04 4:39 PM  
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Objection to sight MM411 (formally SCS30) Bramley/ Beaver Hill Fields

I consider it unsound to release this site from the green belt.

Roads

This site requires traffic from an additional 827 houses a school and burial ground to go onto Beaver Hill road. This road is already struggling with current traffic, which has been getting progressively worse particularly since the very large scale development at Waverly. This has had a big impact on congestion in the area. We regularly see heavy congestion on this and connecting roads. It also regularly floods a few time each winter. Causing big traffic issues. Building on these field will only increase this. There are also known issues with poor air quality again raised at earlier stages of this consultation and poorer health in Handsworth compared to other areas of the city.

The plan says that the development on this site is subject to further transport assessment. The council is therefore yet to demonstrate development on this scale is safe or suitable. This is desperate knowing there are key issues with congestion and that the nearby road network is already dealing with loads of extra traffic from the Waverley estate as well as pollution issues.

Housing number

There were a number of issues raised in the consultation period that would reduce the housing possible on this site. Issues like mines, flooding and hedgerows, yet the level of housing the council is still claiming this site can support has only been revised around the land it can't use (as the owner had not given permission to use it). They haven't reduced numbers for all the modification needed on this site to make it suitable. The council is therefore not giving a true reflection of what this site could actually deliver.

This unrealistic view of the site could have easily led to flawed decision making and discounting of other sites that would have given a much fairer distribution of new housing across the city. It also means they haven't demonstrated that the site can actually deliver key infrastructure needed to allow such a major expansion of the Handsworth population such as the proposed extra school.

There are also issues with other key services in the area a further information request makes it clear that current health infrastructure (GP services) is beyond capacity already and will not be able to cope with the big increase in population in this small area. The council has again not set out a plan for how this can be resolved other than saying the developer may arrange extra rooms to be added, but they have not even confirmed this is possible before agreeing that this site should be used.

## Nature

The council has also not shown how a 10% net gain could be achieved for this site required by the environment act. This site has major ecological value. The council's own ecological assessment says it could be used for national biodiversity schemes.

## Engagement

Also as a disabled member of the public I have found the engagement and way information has been delivered/ displayed hard to navigate. I do not feel this has been a true exercise to engage with communities, if it was information wouldn't have been presented so poorly and so often late.

## In conclusion

There are other sites that have been removed from the local plan as the council can't prove deliverability. Yet despite, concerns being flagged raising multiple issues with this site, the council has not proven what this site could deliver, what is needed to make it suitable for development, what mitigation would realistically be needed to local infrastructure and services or how these would be delivered. Despite this the council has chosen a plan that massively increases the population of Handsworth, rather than considering a fairer distribution across the city that would have much smaller impact on any one areas service or infrastructure. This development will lead to major issues for the infrastructure and services in an area already massively impacted by the Waverly development.

Yours sincerely

Charlotte Pinder

**REF5.0316**

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**Recommendations on main modifications mm410 and mm411**

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**From** [REDACTED]  
**Date** Mon 2026-05-04 4:40 PM  
**To** SheffieldPlan <sheffieldplan@sheffield.gov.uk>  
**Cc** [REDACTED]

 1 attachment (104 KB)

I am sharing 'Ward Objection MM410 MM411' with you.pdf;

External email

Please see our attached objection. Thank you.  
Yours sincerely  
Mr & Mrs Ward  
Sent from my Galaxy

5 May 2026

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

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

We are Joanne and Ian Ward. We have lived at [REDACTED] for 29 years. Ian was born in this house. This is not just where we live — it is where our family has its roots. We object to MM410 and MM411 in the strongest possible terms.

### **1. This plan was not made with this community.**

Key documents were published after consultation opened. MM410 and MM411 introduce major new allocations never in the submitted Plan — a misuse of the Main Modifications process that should have triggered a full Regulation 18/19 consultation.

### **2. S13 is bearing an unfair share of this city's Green Belt burden.**

These two allocations account for 43.4% of all Green Belt housing across Sheffield — over 90 hectares of farmland lost in one postcode, while more affluent areas with access to the Peak District are largely untouched. No justification has been given for this concentration.

### **3. The roads cannot cope — and the plan admits it.**

The Plan states access to SES30 is 'subject to further transport assessment' — an admission that safe access has not been demonstrated. The roads around S13 were already gridlocked at peak times before the new Lidl opened on Rotherham Road. Residents formally objected to that development on traffic grounds, warning the area was at breaking point. The Lidl has made congestion worse and brought a significant increase in vehicle movements and associated emissions to roads that were already failing. Adding 1,697 new homes on top of this is not sound planning — it is compounding a problem that has never been resolved.

### **4. Our GP surgeries are at capacity with no funded solution.**

A Freedom of Information request to the NHS confirmed GP surgeries in S13 are at or beyond capacity with no confirmed, funded plan to cope with thousands of additional patients. Saying surgeries 'may be expanded' is not a plan.

### **5. The Council's own documents contradict each other on archaeology.**

EXAM 130 rates SES30 as having 'little or no archaeological constraints.' EXAM 127 identifies Iron Age–Romano-British cropmarks and requires exclusion of archaeological areas from development. These cannot both be right.

### **6. The green space this plan destroys cannot be replaced — and for some of us it is the only green space we can reach.**

Joanne has mobility difficulties and relies on the green fields and open paths in S13 as accessible, nearby space where she is able to get outside and walk. These fields are close, flat, and reachable from home — there is no equivalent alternative within practical distance. The Council's own IIA acknowledges negative effects on mental health and

wellbeing from Green Belt loss — in one sentence, with no mitigation. The proposed compensatory improvements do not come close to replacing what would be permanently lost, and for people with limited mobility they are not a realistic substitute at all.

## 7. The housing numbers do not add up.

The assumed yield for both sites is overstated. A major archaeological constraint at SES30 alone affects approximately 3 hectares. Mining legacy, flood risk, and biodiversity buffers have not been properly deducted from the developable area.

---

For all of these reasons, we consider MM410 and MM411 to be unsound and legally non-compliant. We formally request that the Inspectors decline to recommend these modifications, require SES29 and SES30 to be removed from the Sheffield Local Plan, and direct that both sites be retained within the Green Belt.

Ian was born in this house. We have raised our family here for 29 years. We are asking the Inspectors to protect the community we have built our lives in.

Yours faithfully,

**Joanne Ward Ian Ward**

[Redacted signature]

Residents of S13 for 29 years

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## Sources

- Sheffield City Council, Schedule of Main Modifications (2026) — MM410 and MM411
- EXAM 127 — Heritage Impact Assessment (Iron Age–Romano-British cropmarks; exclusion of archaeological areas required, para. 5.5)
- EXAM 127A — re-signposts 2015 Archaeological Scoping Study; exposes EXAM 130 scoring as unsound
- EXAM 130 — Suitability Assessment ('little or no archaeological constraints', p. 42)
- Sheffield City Council, IIA Update and Addendum (2026) — acknowledges negative effects on health, wellbeing and environment
- Freedom of Information request to NHS South Yorkshire ICB re: GP capacity in S13 (2025–2026)
- Save S13 Green Belt — farmland and housing allocation data: [saves13greenbelt.org.uk/kier-starmer-farmland](https://saves13greenbelt.org.uk/kier-starmer-farmland)
- Town and Country Planning (Local Planning) (England) Regulations 2012 — Regulations 18 and 19
- National Planning Policy Framework (December 2024) — MHCLG

**REF5.0317**

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**Re: Sheffield Local Plan Examination – Formal Objection to SES29 (Handsworth Hall Farm) and SES30 (Bramley Lane / Beaver Hill Road)**

---

From [REDACTED]  
Date Mon 2026-05-04 4:48 PM  
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Sir or Madam,

**Re: Sheffield Local Plan Examination – Formal Objection to SES29 (Handsworth Hall Farm) and SES30 (Bramley Lane / Beaver Hill Road)**

I submit this representation to object in the strongest terms to the proposed allocation of Green Belt sites SES29 and SES30. For the reasons set out below, these allocations render the Plan unsound when assessed against the tests in paragraph 35 of the National Planning Policy Framework (NPPF): namely that it must be positively prepared, justified, effective, and consistent with national policy.

**Personal Statement – Objection to the Sheffield Plan (S13 Green Belt)**

I have lived in the S13 area all my life, and my husband has lived here since he was 11. We are both now [REDACTED] years old. This community is not just where we live—it is where we have built our lives over decades.

When we purchased our home on [REDACTED] we paid a higher price specifically because of the understanding that the fields behind our property were designated Green Belt land. This designation gave us confidence that the open landscape, views, and character of the area would be protected for the long term. The proposed development fundamentally undermines that expectation.

I strongly believe it is short-sighted to release Green Belt land before fully exhausting brownfield sites and vacant properties across the city. There are clearly alternative locations for development that would not result in the permanent loss of valuable open countryside. It is difficult to understand why areas like S13 are being asked to sacrifice their green spaces while other parts of the city appear to be protected.

The open spaces in S13 are of enormous value to the local community. For me personally, these fields are part of my daily life. I use them regularly to manage stress and maintain my wellbeing. They provide a safe, peaceful environment where I can walk alone and feel secure. This is not something that can be replaced by built development.

At an early consultation meeting, I was told that the impact would be minimal because wooded areas would remain and that the new housing estate would include paths with grass verges for walking. I found this deeply dismissive and lacking in understanding. A constructed estate environment is not comparable to natural, open countryside. The sense of space, tranquility, and connection to nature cannot be replicated with planned pathways between houses.

Beyond personal impact, the development would result in the irreversible loss of wildlife habitats, flora, and fauna. These ecosystems have developed over many years and, once destroyed, cannot

simply be recreated elsewhere. Future generations will lose the opportunity to experience and benefit from this natural environment.

Each morning, I look out across these fields and feel a deep sense of sadness knowing they may soon be gone. This is not just about a view—it is about losing a vital part of our environment, our wellbeing, and our local identity.

In conclusion, I urge planners to reconsider the inclusion of this Green Belt land in the Sheffield Plan. Greater priority should be given to brownfield development and the reuse of existing sites, ensuring that essential housing needs are met without sacrificing irreplaceable green spaces like those in S13.

Below are my thoughts which are using the focus points of the Sheffield Plan.

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## **1. Summary of Objection**

### 1.1 The proposed allocations:

- result in significant and evidenced environmental harm;
- rely on vague and unquantified mitigation (“Golden Rules”);
- represent a substantial and unjustified departure from the spatial strategy;
- depend on unproven, deferred mitigation (including HRA measures);
- fail to demonstrate deliverability, availability, and viability;
- are based on unrealistic assumptions regarding housing capacity and build-out rates;
- lack confirmed infrastructure and safe access arrangements;
- rely on incomplete, outdated, or post hoc ecological evidence; and
- involve speculative Green Belt release based on uses that may not occur.

1.2 Taken together, these issues demonstrate that the Plan is not justified, not effective, and not supported by proportionate or robust evidence.

---

## **2. Conflict with NPPF – Soundness (Paragraph 35)**

### **Justified (Para 35b)**

2.1 The Plan is not justified as it is not based on proportionate evidence. The Council’s own Integrated Impact Assessment (IIA) confirms that the modified Plan performs worse across key environmental objectives, including:

- soil and land use;
- landscape and townscape;
- biodiversity; and
- transport.

2.2 The IIA Non-Technical Summary (Page 16) explicitly states that these adverse effects arise from increased reliance on Green Belt release and development in peripheral, car-dependent locations. The environmental harm is therefore clearly evidenced and attributable to the proposed modifications.

2.3 The Council has not demonstrated that this harm is necessary, nor that reasonable alternatives have been exhausted. The environmental trade-offs have not been justified.

### **Effective (Para 35c)**

2.4 The Plan is not effective as deliverability is not demonstrated:

- viability is acknowledged as “unclear” (IIA Report Version 2, Page 302);
- infrastructure requirements are not fully costed or committed;
- access strategies remain unresolved;

- ecological mitigation is deferred; and
- key site constraints have not been adequately accounted for.

2.5 The Inspectors have only identified the sites as “potentially deliverable/developable,” which falls short of the requirement to demonstrate actual deliverability.

---

### **3. Failure of the “Golden Rules” for Green Belt Release**

3.1 The Plan relies on “Golden Rules” (affordable housing, open space, and compensatory improvements) to justify Green Belt release.

3.2 However, these are not defined in a site-specific, measurable, or enforceable way. In particular:

- the requirement for compensatory improvements described as “suitable and effective” (MM352) has no quantified metric;
- no evidence is provided on deliverability or viability;
- there is no clarity on how compliance will be secured.

3.3 Unlike Biodiversity Net Gain (BNG), which requires a statutory 10% uplift, these provisions are vague and open to interpretation.

3.4 Reliance on undefined measures renders the Plan unjustified and ineffective.

---

### **4. Significant and Unjustified Change to Spatial Strategy**

4.1 The Council’s consultants (AECOM) confirm that the modifications are significant, requiring further appraisal due to:

- Green Belt release;
- changes to spatial strategy; and
- additional infrastructure implications.

4.2 Housing numbers in South East Sheffield increase from 1,640 to 3,013 dwellings (an 84% increase).

4.3 The Inspectors acknowledge this as a “significant departure” from the established spatial strategy (Stage 2 Post-Hearings Letter, Paragraph 37).

4.4 Despite this, cumulative impacts have not been robustly assessed. Instead, key issues are deferred to later stages, undermining the Plan’s evidential basis.

---

### **5. Habitats Regulations Assessment (HRA)**

5.1 The HRA concludes no adverse effect on integrity, but only on the assumption that mitigation will be delivered in the future.

5.2 A detailed Mitigation Delivery Plan is not yet prepared and may follow up to 12 months after adoption.

5.3 This approach is not legally robust. Mitigation measures must be:

- specific;
- costed;
- secured; and
- demonstrably deliverable at the point of examination.

5.4 Reliance on future, undefined mitigation undermines the validity of the HRA conclusions.

---

## **6. Ecology and Biodiversity Net Gain**

### **SES30**

6.1 The Council has not demonstrated how the mandatory 10% Biodiversity Net Gain (Environment Act 2021) will be achieved.

6.2 The ecological assessment:

- identifies high-value habitat across the entire site;
- suggests the land could be suitable for BNG habitat registration; and
- confirms that protected species surveys should have been undertaken prior to allocation.

6.3 There is no quantified assessment of biodiversity loss or mitigation.

### **SES29**

6.4 The Baseline BNG Assessment:

- predates allocation by over a year;
- was published after the allocation decision; and
- identifies missing survey work.

6.5 These deficiencies are not rectified in MM410. Ecology is deferred to later stages.

6.6 Allocation based on incomplete, outdated, and retrospectively disclosed evidence is not sound.

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## **7. Site Constraints and Capacity Assumptions**

### **SES30**

7.1 Significant constraints include:

- watercourses;
- proximity to ancient woodland (Shirtcliff Wood);
- hedgerows and veteran trees;
- public rights of way;
- coal mining risk; and
- ecological buffers.

7.2 These materially reduce developable area and undermine housing assumptions.

### **SES29**

7.3 The Council assumes 44.84 ha developable land. The landowner's masterplan shows only 34.59 ha (a 23% reduction).

7.4 This discrepancy significantly affects capacity and deliverability.

---

## **8. Unrealistic Delivery Rates**

8.1 Expected delivery rates:

- SES30: ~150 dwellings per annum;
- SES29: ~110 dwellings per annum.

8.2 These rates exceed typical benchmarks and are not supported by evidence.

8.3 Comparable large-scale developments with fewer constraints do not achieve these outputs.

8.4 The Plan's housing buffer is less than 1% (298 units), making it highly vulnerable to under-delivery.

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## **9. Speculative Green Belt Release (SES30)**

9.1 Nine hectares are allocated for a school and burial ground without confirmed need or suitability.

9.2 Evidence indicates:

- the school may not be required;
- no evidence supports burial use.

9.3 If these uses do not proceed, the land will be reconsidered—likely for housing.

9.4 This undermines the “exceptional circumstances” required for Green Belt release.

9.5 The allocation is therefore speculative and unjustified.

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## **10. Deliverability and Double Standards**

10.1 Other sites (e.g. SES27) are removed due to lack of availability.

10.2 By contrast, SES29 and SES30:

- have unresolved landownership and tenancy issues;
- lack clear evidence of availability.

10.3 This inconsistency undermines the Plan's credibility and evidential rigor.

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## **11. Viability**

11.1 The IIA confirms that viability is “unclear” due to site constraints.

11.2 Costs not properly accounted for include:

- infrastructure;
- ecological mitigation;
- contamination remediation;
- mining stabilisation.

11.3 Viability cannot be deferred to application stage. It must be demonstrated at plan-making stage.

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## **12. Contamination and Mining Risk (SES29)**

12.1 The site:

- lies near historic landfill;
- contains potential contamination;
- is affected by coal mining risk.

12.2 No comprehensive site investigation has been undertaken.

12.3 Without this, developable capacity and costs are unknown.

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## 13. Access and Transport

### SES30

13.1 All access is via Beaver Hill Road, which is already constrained.

13.2 The Retford Road / Beaver Hill Road junction is forecast to operate at:

- 98% capacity with improvements;
- over 150% without.

13.3 This indicates severe congestion and network failure.

13.4 Traffic impacts include:

- increased air pollution near Handsworth Grange School;
- rat-running on local roads.

### SES29

13.5 Access remains “subject to further assessment.”

13.6 Significant infrastructure is required but not funded or committed.

13.7 Safe and suitable access is not demonstrated.

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## 14. Conclusion

14.1 The proposed allocations at SES29 and SES30 fail the tests of soundness:

- **Not justified:** environmental harm is evidenced but not justified; alternatives not demonstrated.
- **Not effective:** deliverability, viability, infrastructure, and mitigation are uncertain or deferred.
- **Not positively prepared:** relies on speculative assumptions and future interventions.
- **Not consistent with national policy:** fails to demonstrate exceptional circumstances for Green Belt release.

14.2 The Plan relies on assumptions, vague policies, and future mitigation rather than robust, present-day evidence.

14.3 The Council has not demonstrated that these sites can be delivered, mitigated, or justified.

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## 15. Requested Change

15.1 The allocations SES29 and SES30 should be removed from the Plan.

15.2 The Council should revisit its spatial strategy and identify alternative approaches that:

- avoid unnecessary Green Belt release;
- are supported by robust and up-to-date evidence; and
- demonstrably meet the tests of soundness.

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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 respectfully request that this representation be fully considered by the Inspectors as part of the examination process.

Yours faithfully,

Carol Simcox



**REF5.0318**

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

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**From** [REDACTED]  
**Date** Mon 2026-05-04 4:54 PM  
**To** SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Sir/Madam,

Myself and my husband are writing to formally object to Main Modifications MM410 (SES29) and MM411 (SES30) to the Sheffield Local Plan.

Our objection is specifically on the grounds that these Main Modifications are unsound. They do not provide a clear, justified or deliverable plan for the infrastructure required to support the proposed development, particularly in relation to healthcare provision.

In my experience, local GP services are already under significant pressure. I have to book appointments far in advance just to secure a slot, which indicates that capacity is already stretched. The plan does not set out how this will be addressed for the additional residents these sites would bring.

Local infrastructure more broadly is also under strain. Since recent changes to the road layout and the construction of the Lidl supermarket, traffic has increased substantially. We now regularly experience heavy congestion, with queues of idling vehicles outside our home throughout the day. This will have had a substantial, negative impact in air pollution affecting our long term health. The addition of more housing, and therefore more cars, will inevitably worsen this situation. The presence of idling traffic also increases noise pollution with cars playing loud music whilst sat in traffic. All of this means our quality of life is impacted now from recent changes, let alone with all the extra houses and cars.

The loss of green space is also a serious concern. Existing green areas help to mitigate pollution and support residents' physical and mental wellbeing. Reducing this provision, while increasing population density, will have a negative impact on physical as well as mental health and our quality of life. We would propose the expansion of green areas if anything to help us achieve the same standard of living as those in the west of the city, who not only benefit from a greater amount of green space, but also have a tiny proportion of housing being proposed for building in this area. This highlights the unfairness of the plan in terms of distribution of development and further expanding the wealth gap between the east and west of the city.

Crucially, the Main Modifications do not acknowledge these existing pressures, nor do they set out a clear or realistic plan for how infrastructure—especially healthcare—will be improved to accommodate growth. As such, they are not effective or justified, and therefore fail the tests of soundness. There are no clear measures or guarantees showing how these proposed improvements will be achieved in practice. The Council's own assessment shows the modified plan performs worse for the environment, including impacts on land, biodiversity and transport

For these reasons, we consider the Main Modifications to be unsound. The plan is not justified by sufficient evidence and is not effective in practice. There is no clear, deliverable plan to support this level of development.

We request that the sites associated with MM410 (SES29) and MM411 (SES30) are removed from the plan and remain designated as Green Belt.

Yours faithfully,

Mr and Mrs Jackson

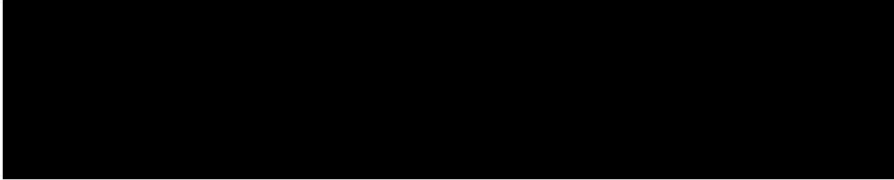
**REF5.0319**

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

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From [REDACTED]  
Date Mon 2026-05-04 5:25 PM  
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>



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,


Alex Radford

**REF5.0320**

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

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From   
Date Mon 2026-05-04 5:30 PM  
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>



Dear Strategic Planning Team,

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

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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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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.

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from its proximity to the blue tram route and a high-frequency bus corridor', however, the lived experience of current residents is that this route is already under pressure during peak times and buses are infrequent and unreliable. As such, it is unclear how the proposed level of housing growth in S12 can be accommodated without substantial and clearly defined transport infrastructure improvements.

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

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

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

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

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

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,

**Alison Broadhead**

Sent from my iPhone

**REF5.0321**

## MM411/MM410 objection

---

From [REDACTED]  
Date Mon 2026-05-04 5:34 PM  
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

I'm writing to object to the modifications to the main plan for ses30.

I feel it is unsound to allow the developments and destroy the green belt area here.

The infrastructure in the area is already inadequate for the volumes of traffic and prone to flooding. Removing this woodland and the surrounding green fields would add an enormous amount of surface water to the affected areas (bottom of the hill on Beaver Hill Road), and the high number of houses proposed in this land would also add to the pressures on this already overused road with blind bends and steep hills either side. Add to this the already oversubscribed GP surgeries and local facilities and the lack of decent access to the site and disruption to local people and wildlife, and I find the plan unsound and the site should be removed from the plan and kept as greenbelt.

The councils own evidence shows that the viability of these sites is unclear, which raises concerns of whether they can actually be delivered.

If it's not clear that they can be delivered, then the plan cannot be considered effective.

Please make the right decision for this area and the future of our children and grandchildren, once the green belt is gone it will never be replaced.

Ann Thompson  
[REDACTED]


Sent from my iPhone

**REF5.0322**

**Objection Letter - Main Modification MM411 (SES30)**

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**From** [REDACTED]  
**Date** Mon 2026-05-04 5:38 PM  
**To** SheffieldPlan <sheffieldplan@sheffield.gov.uk>

 1 attachment (9 KB)

Objection Letter - Main Modification MM411 (SES30).pdf;

External email

Please see attached objection to main modification MM411 (SES30)

Please confirm that my objection has been received and logged.

Many thanks

Rob Purseglove

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

04/05/2026

Dear Sheffield City Council Planning Team,

**Objection to Sheffield Local Plan Main Modification MM411 (SES30)**

I am writing to formally object to Main Modification MM411 (SES30) relating to Bramley / Beaver Hill Fields.

I consider this modification to be unsound and do not support the release of this site from the Green Belt. I request that Bramley / Beaver Hill Fields (SES30) are removed from the plan and remain protected as Green Belt.

The modification is not properly justified and is not deliverable in practice. It relies on future assessments and unclear proposals rather than demonstrating how development of this scale can actually be supported.

There is no clear or deliverable plan for infrastructure, particularly healthcare. In my experience, it is already incredibly difficult to get a GP appointment, and I have not been able to access an NHS dentist. Local services are clearly at or beyond capacity, and the plan does not show how this will be addressed. Saying services may be expanded is not the same as having a funded and deliverable solution.

Road infrastructure is also already under significant pressure. Traffic is particularly bad at rush hour, with long queues at the top of Handsworth and along Retford Road. The proposal to route all traffic from a development of this size onto Beaver Hill Road raises serious concerns. The fact that this is still subject to further transport assessment shows that safe and suitable access has not been properly demonstrated.

More broadly, the modification relies on future mitigation and further work rather than providing clear, evidenced solutions now. This means the plan is not sufficiently developed and cannot be considered effective.

The environmental impact has also not been properly justified. There is no clear evidence showing how biodiversity improvements will be achieved, and the loss of Green Belt is not adequately compensated. These fields are valuable open space

that my family uses daily for walking and exercise. We value the views and the opportunity to see local wildlife, which would be lost.

The assumptions around the scale of development also appear unrealistic, with important site constraints not fully taken into account. This raises further concerns about whether the site is genuinely deliverable.

For these reasons, I consider Main Modification MM411 to be unsound. The plan is not justified by sufficient evidence, is not effective in practice, and does not provide a clear or deliverable strategy for infrastructure or environmental protection.

I therefore request that Bramley / Beaver Hill Fields (SES30) are removed from the plan and remain as Green Belt.

Yours sincerely,

Robert Purseglove

**REF5.0323**

## Objection Letter

---

**From** [REDACTED]  
**Date** Mon 2026-05-04 5:43 PM  
**To** SheffieldPlan <sheffieldplan@sheffield.gov.uk>

 1 attachment (11 KB)

Objection Letter - Main Modification MM411 (SES30) - SP.pdf;

External email

Please see attached objection to main modification MM411 (SES30)

Please confirm that my objection has been received and logged.

Regards

Sarah Purseglove

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

04/05/2026

To whom it may concern,

**Objection to Sheffield Local Plan Main Modification MM411 (SES30) -Bramley / Beaver Hill Fields**

I am writing to formally object to Main Modification MM411 (SES30) in the Sheffield Local Plan Main Modifications. I consider this modification to be unsound, and I am requesting that Bramley / Beaver Hill Fields (SES30) be removed from the plan and retained as Green Belt.

I live on the [REDACTED] and use these fields regularly for walking and exercise. They are genuinely the last green space in the S13 area, and the thought of losing them permanently is deeply concerning. Once they are gone, they are gone.

I want to be clear that this is not a repeat of previous objections. My concern is specifically with the Main Modifications themselves, which I do not believe are properly worked out or deliverable.

Over the past two years my experience of local GP services has been poor. Waiting lists are long, I have never been able to see the same GP twice, and the surgery now strongly discourages phone contact in favour of an online system called Accurx. The service is clearly already under significant pressure.

The modifications do not contain any clear or confirmed plan for how healthcare services will cope with the additional population this development would bring. Stating that services 'may be expanded' is not a deliverable plan. It is a vague promise with no funding, no timetable and no guarantee. When you consider the cumulative impact of multiple developments drawing on the same local services, the situation becomes even more serious.

The modifications require that all traffic from 827 homes, a school and a burial ground would use Beaver Hill Road. Traffic in this area is already a serious problem. Handsworth Road leading onto the Parkway is consistently congested, particularly during school drop-off and pick-up times, when people finish work, and throughout the weekend. The volume of nearby supermarkets and fast food outlets adds to this on a daily basis.

The plan itself acknowledges that access is 'subject to further transport assessment', which means safe and suitable access for a development of this scale has not actually been demonstrated. That alone should make this modification unsound.

The Council's own ecological assessment has indicated that this site could be used for national biodiversity schemes rather than development, yet no protected species surveys were carried out before allocation. There has been no proper consideration of the wildlife that relies on these fields, or of the impact that additional traffic and pollution would have on the health of local residents. The 15-metre buffers required by MM411 for the adjacent ancient woodland and wildlife site are simply not adequate.

The modifications also fail to demonstrate how the required 10% net gain in biodiversity could be achieved on this site. The proposed 'compensatory improvements' such as rights of way at Shirecliffe Valley or access at Flockton Park are not an adequate or meaningful replacement for the loss of this land.

The Council's assumptions about the number of homes that can be built on these fields do not appear to account for real constraints such as mining history, hedgerows and flood risk. The figures do not add up, and the modifications have not been properly evidenced.

Throughout the modifications, key details are repeatedly deferred to later stages. Other sites have been removed from the plan precisely because they could not be shown to be deliverable, yet these Green Belt sites are being included without the same standard of evidence being applied. A plan that relies on future solutions to problems that have not yet been properly defined cannot be considered sound, justified or effective.

For all of these reasons, I consider Main Modification MM411 to be unsound. The plan is not supported by sufficient evidence and is not effective in practice. I request that Bramley / Beaver Hill Fields (SES30) is removed from the plan and remains Green Belt.

Yours sincerely,

Sarah Purseglove


**REF5.0324**

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Site NES36 Main Modifications Objection

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From [REDACTED]  
Date Mon 2026-05-04 5:58 PM  
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>  
Cc [REDACTED]

 1 attachment (67 KB)  
Stuart Keen - May 2026 - Main Modification.pdf;

External email

Dear Sheffield Plan

Please find attached objection to the Main Modifications of site NES36.  
This document is sent on behalf of **Mr Stuart Keen of 1 Loicher Lane, Ecclesfield, Sheffield.**  
Who has asked me to send this for them as I am helping them with email communication.

Kind Regards

Bec Nutton  
[REDACTED]  
[REDACTED]

*Receiving this email outside of normal working hours? Managing work and life balance is unique for everyone. I have sent this email at a time that works for me. Please respond at a time that works for you.*

## **Objection to the Main Modification relating to the allocation of land at Site NES36 – Smithy Wood – in the Draft Sheffield Local Plan**

**From Mr Stuart Keen of** [REDACTED]

I am writing to object to the Main Modification relating to the allocation of land at NES36.

I am extremely concerned and frustrated that this land was originally included in the plan without my knowledge or consent. I have had to spend a significant amount of time and effort challenging this and working to have my land removed from the allocation. While that has now happened, it has resulted in a situation where the site has been changed but the important assessments have not been properly revisited. This is not acceptable.

I run a working cattle breeding farm directly next to this site and I am very concerned about the impact this development would have on my ability to continue farming.

My farm depends on the health and behaviour of the cattle. They are sensitive to changes in their surroundings. The proposal would bring large-scale industrial activity right up to my boundary, including HGV traffic, noise, lighting and general day and night activity. This has not been properly considered in the plan.

Noise from vehicles, machinery and general operations, especially early in the morning or late at night, would disturb the animals. Artificial lighting from the site could also affect them, particularly if it is used overnight. These are not small issues. They affect how the farm works every day.

There would also be a much higher level of activity next to the farm. This would change the nature of the area completely. It could affect how I move and manage livestock and carry out normal farming activities.

There has been no proper assessment of how this development would affect my farm. The Main Modification does not look at the impact on an existing agricultural business and assumes these issues can be dealt with later. Given the scale of the proposal, that is not acceptable.

There is also no clear buffer between the proposed development and my land. Any buffer that would actually reduce noise, light and disturbance would need to be significant, and this has not been planned for.

Over time, these impacts could make it harder to continue running the farm. Disturbance to livestock, limits on how I use the land and pressure from neighbouring uses could affect the long-term future of the business.

There is also a risk of future conflict. Bringing industrial development next to a working farm could lead to complaints about normal farming activity, which could further restrict how the farm operates.

In summary, this proposal does not properly consider the impact on an existing, long-established farm. The loss of amenity is not just inconvenience, it affects how the farm works and whether it can continue.


For these reasons, I object to the Main Modification and the continued allocation of this site.

**REF5.0325**

## S13 response

---

**From** [REDACTED]  
**Date** Mon 2026-05-04 6:09 PM  
**To** SheffieldPlan <sheffieldplan@sheffield.gov.uk>

 2 attachments (850 KB)  
ATT00001.txt; Blank 6.docx;

External email

Dear colleagues, please find attached our S13 response. I use 'Pages' to create the doc and sometimes our recipients don't receive it unless as a pdf. Will someone just let me know if received and readable please? A simple got it will do. Many thanks Denise.

S13, green belt. Ref MM411. Bramley/Beaver Hill. From Denise and Alan Casbolt. Resident on [REDACTED] for [REDACTED] years. I am a retired research psychologist and Alan a retired JP.

#### Introduction-

The site should be kept as Green belt. The development proposals are Unrealistic, unfair, unsustainable, unjust and down right wrong. We are suggesting that the site should be removed from the plan.

In this we are pleading for creativity, honesty, we will not use party politics, put downs or direct comparisons. It focusses on all of the work already done by our community that demonstrates very well that the development will not work and why. The objections submitted by myself and my hubby will be referred to.

#### Key points-

1. The site should be kept as green belt. The Haldane society of socialist lawyers (I am a member) would likely oppose the Governments decision to use the green belt for building. It undermines environmental protection and fails to prioritise the needs of communities. They emphasise the need for social justice and equitable distribution of resources. Thus exacerbating inequality. This is exactly how it feels. We are being done to as though it does not matter in our ordinary, working class area. NB Haldane provide legal support and campaigning for Orgreave Truth and Justice Campaign
2. Environmental concerns- these have been picked up thoroughly by the S13 campaign group. Our observation at the minute is about traffic and no way of understanding how building more houses and more vehicles will help. We are flanked by busy, noisy, smelly roads almost making S13 an island. This picture says it all (see appendix) and thats already what it feels like. In addition we have friends and relatives four households that struggle to get out of their drive and onto and off the road. We also would like to know what they plan is for building vehicle access if the plan were to progress? We cannot imagine how diggers, bulldozers, lorries will navigate our estate roads. What will happen to us when we cannot park and folks with mobility issue and chilcare responsibilities are stranded? Urban sprawl can we know have negative effects on a cities well being. The children who walk through the site to and from school do we expect them to get lifts down the busy roads and breathe in the fumes?
3. As members of our marginalised community we fear that there will be some displacement of our residents, housing costs might be increased this making inequalities much worse. It is true that housing is important and more

is needed. We know that there are plans in Sheffield to focus on social housing which is good as affordable housing does not exist. Even so not here. We have six grandchildren aged 21yrs to 29 all wondering what housing is available to them. Three of them live near us in S13.

4. A massive issue for us and referred to at length in our previous stuff is consultation. We have not been consulted at all rather told what's proposed. When evidence has been requested it has not been forthcoming. We both have much experience of working in legal settings on eye watering issues. This would not stand up in those settings.

5. We have not covered the issues that have been picked up thoroughly by the S13 group eg nature, wellbeing etc but want to mention health. We have observed changes in our community that I assume are stress related some brought on by the feelings of no control re this and the fear of losing the green belt to an ill thought out plan.

Thank you for taking time to read this and really hope for a community led outcome.

Denise and Alan Casbolt 4th May 2026.

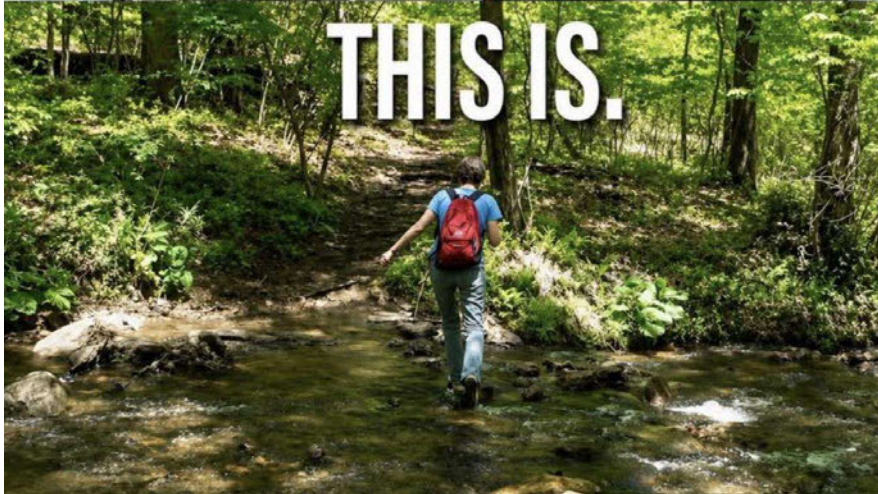
Photo appendix-



Sir David Attenborough Fandom · [Follow](#)  
11h ·



We built cities to live better...  
then forgot what living feels like.





**REF5.0326**

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## MM411 (SES30) Formal Objection

---

**From** [REDACTED]  
**Date** Mon 2026-05-04 6:11 PM  
**To** SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

This is my formal objection to the above modification. I believe the plan to be unsound because:-

1) Problems relating to accessing site SES30. It is proposed that all the traffic from 800 plus homes, a burial site and a secondary school would use Beaver Hill Road. This road is already well used, having local traffic, Handsworth Grange School, and the Fire Service training Centre. It is also the only direct road linking the main A57 and Woodhouse. All the traffic passes directly in front of Handsworth Grange School and converges on the already heavily congested Beaver Hill Road/Retford Road junction. The effect of the SES30 proposals would endanger the lives of our schoolchildren, make air quality even worse and create gridlock. Roads like Old Retford Road and Handsworth Grange Road would become rat runs. The plans have failed to consider these implications and no mitigation is planned.

2) I am very familiar with SES30 and find it hard to understand why it was selected. I am not certain that the proposed homes/school/burial site are deliverable. This site has many problems working against the proposals, ie the presence of Shirtcliff Wood, many public footpaths, old mine workings, protected hedgerows and trees, watercourses and required ecological buffering. A long list of constraints which reduce the size of available land and make the proposals undeliverable.

The severe access problems and the fact the Council have overestimated the land available for building means there is no justification for releasing SES30 from the green belt.

I would formally request the site be remit from the Local Plan and kept as green belt for the community.

Noelle Register

**REF5.0327**

## CH03 Objections for Main Modifications

---

**From** [REDACTED]  
**Date** Mon 2026-05-04 6:37 PM  
**To** SheffieldPlan <sheffieldplan@sheffield.gov.uk>

 2 attachments (2 MB)

Ash-CH03 Objection.pdf; Sheffield Plan Site CH03 Thorncliffe Road Chapeltown v2.1.pdf;

External email

Please find attached my objection to the development CH03 – Warren Lane and any other development proposed on any Green Belt in Sheffield.

Regards

Mark Ash

## Main Modifications Consultation– CH03 (Warren Lane)

### Introduction

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

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

### 1. Green Belt Harm/ Spatial Strategy

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

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

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

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

**Figure 1: Settlement Separation and Green Belt Context**



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

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

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



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

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

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

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

- The site is currently in agricultural use, and the tenant farmers rely on this field for Grazing and livestock feed, the loss of such land will affect the livelihoods of these tenant farmers.
- The open rural character of the site would be replaced with Industrial Units, altering long-established landscape separation and negatively affecting local amenity and the wider visual character of openness.

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

## **3. Transport, Highways and Access Constraints**

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

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

- **Sustainable Travel Modes:**

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

**Cycling:** Much as for walking, the road is quite steep and there are no cycle friendly measures

whatsoever. Only the most serious cyclists would be likely to cycle to work and back. The claim that the site is within 400 metres of an active travel network is questionable, as it probably refers to the circular NCN Route 67, which is more of a leisure loop around High Green, Wentworth, Thorpe Hesley and Parson Cross. Commuter cyclists are unlikely to find this loop beneficial, attractive, or of use to commute.

**Public Transport:** Bus travel facilities are poor, and enhancement is unlikely to be viable. The

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

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

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

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

#### **4. Flood Risk and Drainage Issues**

Flood risk has been identified as a constraint requiring mitigation.

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

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

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

#### **5. Heritage and Setting of Listed Buildings**

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

#### **6. Ecological and Biodiversity Concerns**

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

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

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

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

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

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

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

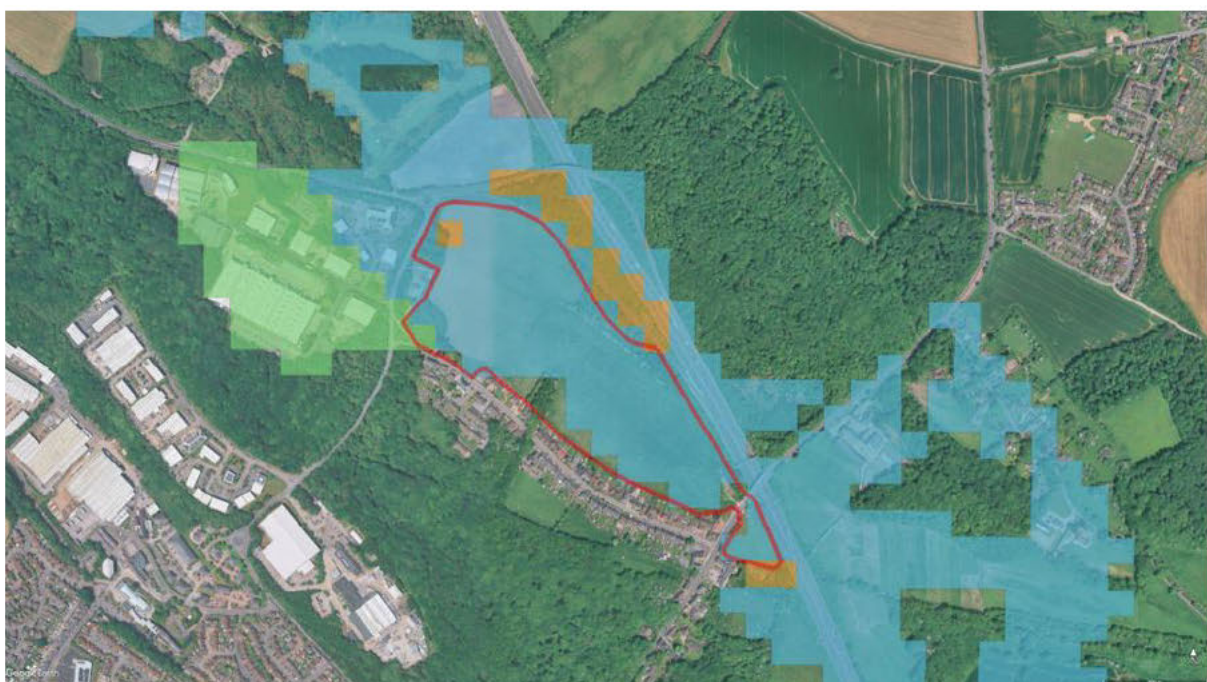
Site	Housing Area	Gross Site Area (Ha)	Housing	Predictive ALC	Comments
CH03	Chapelton & Ecclesfield	18.06		Grade 2	BMV

Key

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

**CH03 (Warren Lane)**

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



## 7. Mining and Ground Contamination/ Stability Risks

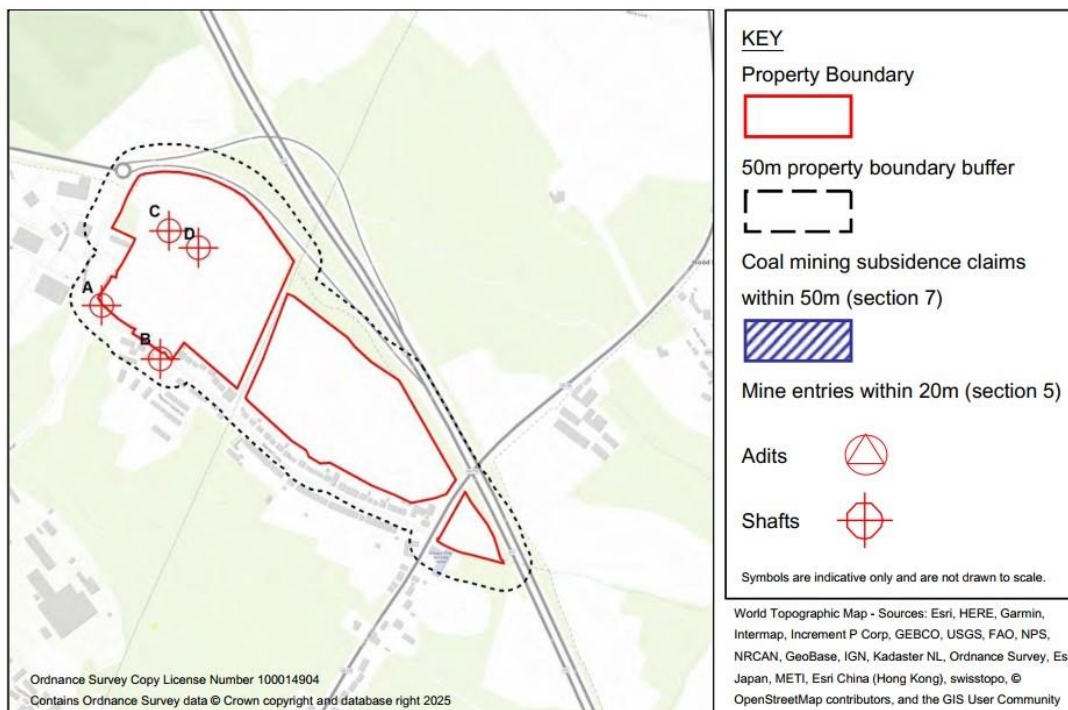
Large portions of the site fall within a Coal Authority Development High Risk Area with known mine entries and shallow workings being present on site. In addition, the site is near a historic landfill site.

**Figure 3: Mining Feature Plan (Appendix 3)**

### SITE LOCATION AND COAL MINING FEATURE PLAN

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

SEARCH NUMBER: 473232



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

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

## Coal Mining Constraints Plan

### **Figure 3: Coal Mining Constraints and No-Build Zones (Appendix 3)**

The site is located within an area of historic mining activity and lies within proximity to a historic landfill.

These factors introduce risks relating to:

- Land instability
- Contamination
- Ground gas migration

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

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

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

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

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

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

### **Buffer Constraints Plan (Appendix 1)**

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

## **8. Residential Amenity Impacts**

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

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

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

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

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

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

## **9. Physical and Infrastructure Constraints**

The site is affected by several major physical constraints:

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

These constraints prevent built development across significant areas.

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

## **10. Deliverability and Phasing Uncertainty**

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

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

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

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

## **11. Conclusion**

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

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

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

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

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

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

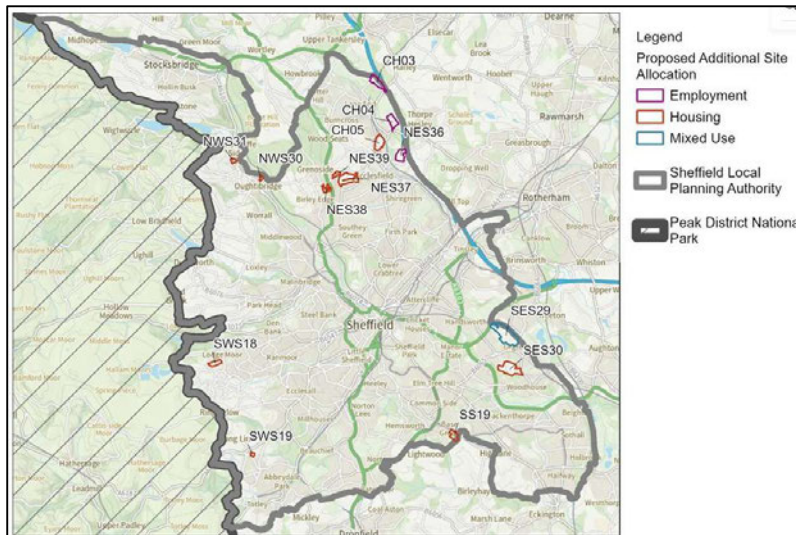
M Ash

Resident: [REDACTED]

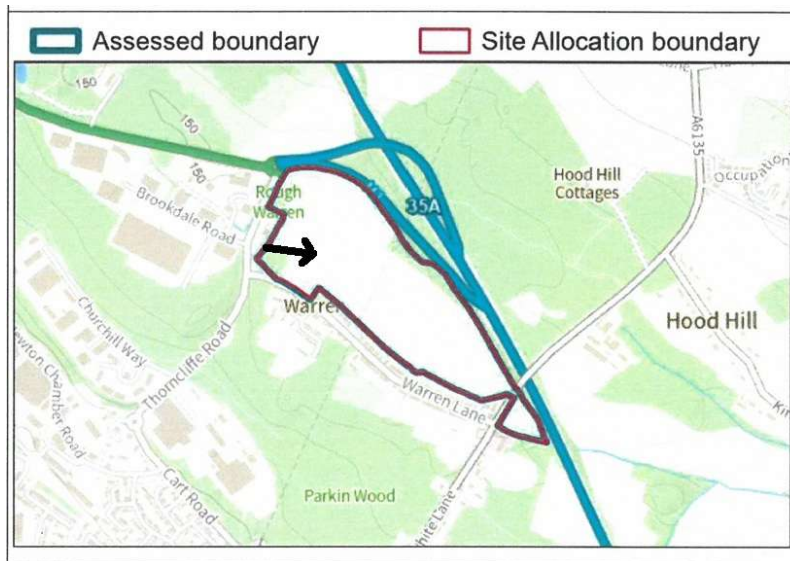
# “The Sheffield Plan”

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

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



Map of Sites - SCC



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

April 2026

## 1 TERMS OF REFERENCE

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

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

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

## **2 INTRODUCTION**

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

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

- 1 Terms of Reference
- 2 Introduction and Executive Summary
- 3 Background
- 4 Assessment of Highway Proposals
- 5 Sustainability
- 6 Injury Collision Record
- 7 Other Factors to Consider
- 8 Conclusions and Recommendations

## **EXECUTIVE SUMMARY**

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

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

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

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

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

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

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

### 3 BACKGROUND

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

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

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

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

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

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

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

## Green Belt site allocation appraisal (Employment)

Site Reference: S03112

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

Gross site area: 18.06 Hectares

Net housing area: 0.00 Hectares

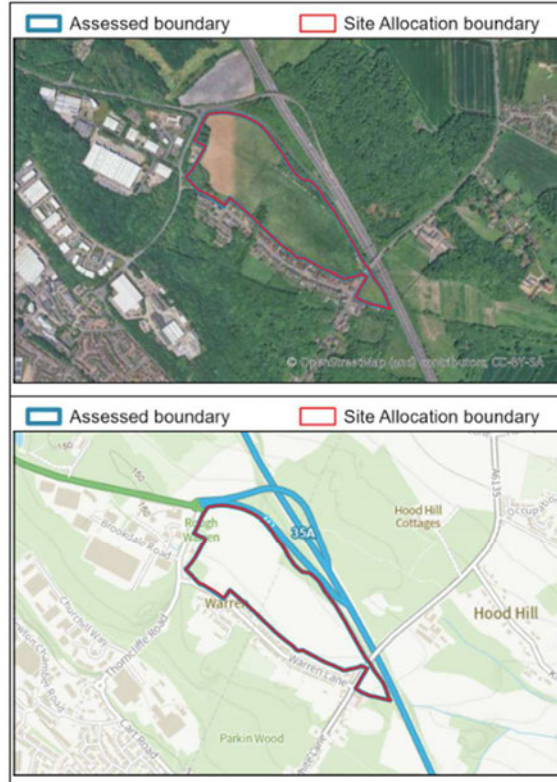
Estimated housing capacity: 0 homes

Net employment area: 18.06 Hectares

Ward: East Ecclesfield Ward

Housing Market Area: Chapeltown & Ecclesfield

Ownership: Private



Page 80 of 332

Distance to core public transport network (CPTN)	Y	Some of the site is within the Core Public Transport Network buffer, or within a 400m walk from a 3 bus per hour bus stop
Access to active travel/cycle network	YY	Site within 400m of an existing or proposed route which is at LTN1/20 standard
Potential to increase the viability of public transport or support investment in new public transport infrastructure	-	Site is beyond 400m of planned bus network improvement or 800m of planned tram/rail network improvement
<ul style="list-style-type: none"> <li>Some of the site is within the Core Public Transport Network, or within a 400m walk from a 3 bus per hour bus stop (as of December 2023). It is about 1.5km from Chapeltown Railway Station.</li> </ul>		
<ul style="list-style-type: none"> <li>Site is within 400m of an active travel/cycle network.</li> </ul>		
<ul style="list-style-type: none"> <li>Potential capacity issues previously identified at junctions (roundabouts) of Burncross Road/Lound Side and Ecclesfield Road/Cowley Lane in Chapeltown town centre (within 2km). Contributions may be required to local highway improvements identified through the additional transport modelling and/or Infrastructure Delivery Plan.</li> <li>Site adjoins the M1 and junction(s) of the A616. Contributions may be required to strategic highways improvements at junctions on the M1.</li> </ul>		

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

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

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

#### **4 ASSESSMENT OF HIGHWAY PROPOSALS FOR SITE CH03**

##### Surrounding Network

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

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

##### Proposed Access off Thorncliffe Road

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

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

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



Proposed Access - Stantec

### Warren Lane

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

## 5 SUSTAINABILITY

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

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

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

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

### **Sustainable Travel Modes**

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

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

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

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

### **Trip Generation and TRICS**

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

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

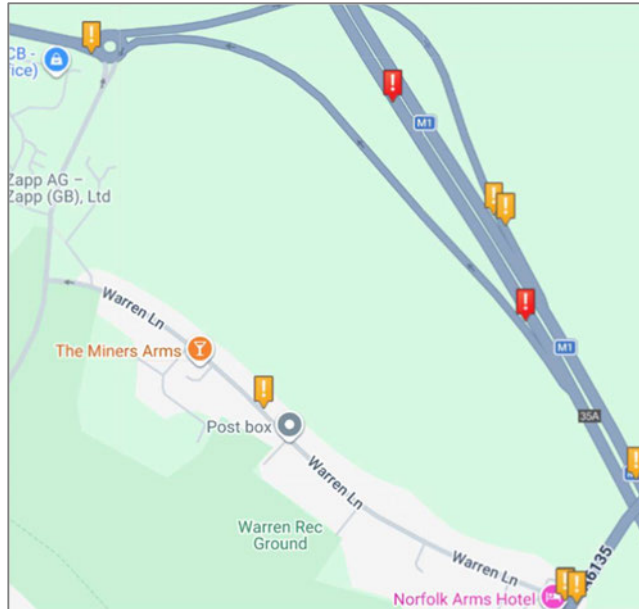
The data should be closely checked to ensure its soundness. Experience has shown that in practice actual trip numbers (especially for private vehicles) are very often higher than those suggested in TA's. Software can easily be used to manipulate and adjust modelled outcomes, whereas in real-world circumstances,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

## **6 INJURY COLLISION RECORD**

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

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

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



Thorncliffe Road Injury Collisions 2020-2024 (CrashMap)

## 7 OTHER FACTORS TO CONSIDER

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

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

## 8 CONCLUSIONS AND RECOMMENDATIONS

### Conclusions

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

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

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

**Justified:** The proposals are not based on proportionate evidence:

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

**Effective:** Deliverable over the plan period:

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

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

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

## **Recommendations**

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

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

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

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

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

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


**REF5.0328**

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**Representation on main modifications mm410 and mm411**

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**From** [REDACTED]  
**Date** Mon 2026-05-04 6:40 PM  
**To** SheffieldPlan <sheffieldplan@sheffield.gov.uk>

 1 attachment (21 KB)  
Wayne Bond Objection MM410 MM411.docx;

External email

Hi please find my attached objection letter  
Thanks  
Wayne Bond

Sent from [Outlook for Android](#)

[REDACTED]

5 May 2026

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

## **FORMAL REPRESENTATION — SHEFFIELD LOCAL PLAN MAIN MODIFICATIONS CONSULTATION**

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**Modification References:** MM410 (SES29) and MM411 (SES30)

**Sites:** SES29 — Handsworth Hall Farm, Finchwell Road | SES30 — Land between Bramley Lane and Beaver Hill Road

**Nature of Representation:** Objection — Both modifications are unsound and should be removed from the Plan

**Representor:** Wayne Bond [REDACTED]

### **Who I Am and Why I Am Writing**

My name is Wayne Bond and I live on [REDACTED] in Handsworth, Sheffield. [REDACTED]

[REDACTED]

I want to write this objection from the perspective of a resident and a father, setting out the practical realities of daily life in S13 that I believe the Inspectors need to understand when assessing these modifications.

Much of my objection comes down to one thing: time. [REDACTED]

[REDACTED] Time that the roads in S13 are increasingly failing to provide — and time that thousands of new homes will consume entirely.


### **The Roads Are Already Failing — Before a Single New Home Is Built**

I need the Inspectors to understand what the roads in S13 are actually like right now, before any new development. The main routes in and out of our area — Rotherham Road, Orgreave Road, Retford Road, and the surrounding network — are already severely congested during peak hours.

This did not happen overnight. The Waverley housing development brought thousands of new residents to the area with no adequate road infrastructure to support them. Residents raised this at the time and were not listened to. The roads around Rotherham Road, Orgreave Lane, and Retford Road became, in the words of one local resident at the time of the Lidl planning application, 'usually gridlocked during peak hours in the morning and afternoon.' That was documented in formal objections submitted to Sheffield City Council in 2021 and 2022.

Then Lidl opened on the corner of Rotherham Road and Orgreave Road — a 1,900 square metre supermarket with 106 car parking spaces, open from 7am to 11pm, seven days a week. Before it was approved, five personal injury collisions were recorded at the nearby Rotherham Road and Retford Road junction in the preceding five years alone, including two classified as serious. Local residents formally objected, warning that the area was already at breaking point. The concerns were noted and the application was approved anyway.

The Lidl has made things worse. Anyone who drives these roads in the morning or at teatime knows it. The queues are longer. The rat-running through side streets is worse. The junction at Rotherham Road is frequently jammed. This is the baseline — the situation right now, before a single new home from SES29 or SES30 is built.



The Council's plan acknowledges that access for SES30 is 'subject to further transport assessment' — meaning they have not demonstrated that the roads can cope. For SES29, the combined traffic from 870 homes and 20 hectares of employment land sharing the same road network has not been properly assessed either. This is not sound planning.

### **Healthcare — A System Already at Its Limit**



All of this runs through Handsworth Medical Practice. A Freedom of Information request submitted to the NHS has confirmed that our local GP surgeries are already at or beyond capacity, and that there is no confirmed, funded plan for how they will manage the additional demand that would come from 1,697 new homes in S13. The Council's answer is that the surgeries could be expanded. I would invite anyone who believes that to try calling Handsworth Medical Practice at 8am and count how long they are in the queue.

When I think about what 5,000 or more new residents would mean for an already overstretched five-doctor practice serving our area, I do not see a manageable challenge. I see a system that cannot cope with what it already has, being asked to absorb an enormous additional burden with no certainty of how or when the resources will be there. For a family that depends on that system every week, that is not an acceptable plan.

## The Green Fields — What They Mean When You Are Struggling

I want to say something about the green fields in S13, because I think it gets overlooked when people talk about this plan in terms of housing numbers and development areas.

[REDACTED]

The fields and open spaces in S13 are not an abstract asset. They are a place to go when the walls of the house close in. They are where we have walked together as a family on the days when we needed air and space and quiet. [REDACTED]

The Council's own Integrated Impact Assessment acknowledges in a single sentence that losing this Green Belt will have negative effects on mental health and wellbeing. One sentence. No plan. No mitigation. No acknowledgement of what that actually means for real people in real circumstances. The plan proposes to remove the very green spaces that support wellbeing, while simultaneously placing unsustainable pressure on the GP services that are expected to pick up the consequences. Both things happening at once, with no solution for either.

### This Cannot Keep Being Done to S13

The Waverley development brought thousands of homes without adequate roads. Then Lidl was approved despite warnings about traffic. Now this plan proposes 1,697 more homes on the last remaining green space in our postcode, accounting for over 43% of the entire city's Green Belt housing allocation in a single area.

At some point, someone has to say: enough. The infrastructure cannot absorb it. The roads cannot cope. The GP surgeries cannot manage it. The green space cannot sustain it. And families like mine — who need the roads to be clear, [REDACTED] the GP to be accessible, and the fields to exist — cannot afford for those things to be taken away.

I am not asking for special treatment. I am asking for the same standard of evidence and the same protection that should apply to any community. The plan does not demonstrate that the infrastructure exists to support this development. It does not demonstrate that the roads are safe. It does not demonstrate that healthcare can be delivered. And it does not justify why S13 must carry this burden alone.

### Conclusion

I am a working father. [REDACTED]

[REDACTED] I need my GP to be able to see my family. And I need the green fields where we have walked and breathed and survived the hardest years of our lives to still be there.

None of those things are guaranteed by this plan. All of them are threatened by it.

I formally request that the Inspectors:

- Decline to recommend MM410 and MM411 as sound and lawful Main Modifications;
- Require sites SES29 and SES30 to be removed from the Sheffield Local Plan; and
- Direct that both sites be retained within the Green Belt and protected from development.

Yours faithfully,

**Wayne Bond**



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## Sources and References

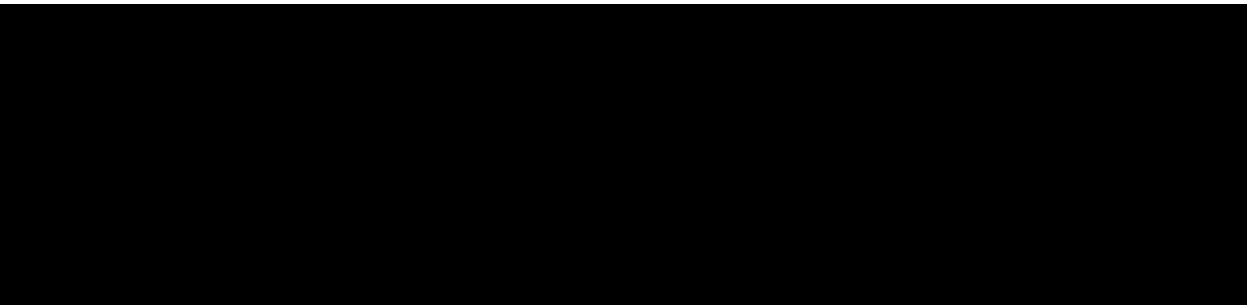
### Traffic and Roads — Handsworth / S13

- YorkshireLive: 'New Lidl store plans for Sheffield hit with objections over traffic gridlock fears' (February 2021) — resident quoted confirming 'the area around Rotherham Road, Orgreave Lane and Retford Road is usually gridlocked during peak hours in the morning/afternoon' due to the existing impact of Waverley development. [examinerlive.co.uk](https://www.examinerlive.co.uk)
- The Sheffield Star: 'New Lidl set to open in Sheffield — but Aldi is unhappy' (January 2022) — confirms 25 formal resident objections; resident on Rotherham Road states 'there are queues of cars right down the road at teatime and it becomes one big parking lot at times'; confirms five personal injury collisions at Rotherham Road/Retford Road junction in five years preceding approval, including two serious. [thestar.co.uk](https://www.thestar.co.uk)
- The Sheffield Star: 'Lidl Sheffield: Construction set to start on new supermarket after fences go up' (January 2025) — confirms Lidl at Rotherham Road/Orgreave Road, Handsworth now proceeding to construction; 1,900sqm store, 106 parking spaces, open 7am–11pm daily. [thestar.co.uk](https://www.thestar.co.uk)
- OpeningTimesIn.uk: Lidl, Orgreave Road, Sheffield S13 9LJ — confirms store location immediately adjacent to Ballifield Primary School, Handsworth Grange Road and Beaver Hill Road.

### Sheffield Local Plan and Transport

- Sheffield City Council, Schedule of Main Modifications (2026) — MM410 (SES29) and MM411 (SES30)
- Sheffield City Council, Sheffield Plan site allocation for SES30 — states development is 'subject to further transport assessment', confirming safe access has not yet been demonstrated
- Save S13 Green Belt: S13 accounts for 43.4% of all Green Belt housing in Sheffield. [saves13greenbelt.org.uk/kier-starmer-farmland](https://www.saves13greenbelt.org.uk/kier-starmer-farmland)

### Healthcare

- Freedom of Information request to NHS South Yorkshire ICB re: GP capacity in S13 (2025–2026) — confirms surgeries at or beyond capacity; no confirmed funded expansion plan
  - CQC records — Handsworth Medical Practice: 5-doctor practice serving Handsworth, Woodhouse, Richmond, Stradbroke and Darnall from two sites. [cqc.org.uk/location/1-542702937](https://www.cqc.org.uk/location/1-542702937)
- 

### Mental Health and Green Space

- Sheffield City Council, IIA Update and Addendum (2026) — acknowledges negative effects on mental health and wellbeing from Green Belt loss, with no mitigation plan

**REF5.0329**

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**Sheffield Local Plan: Main Modifications and Additional Modifications - Input**

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**From** [REDACTED]  
**Date** Mon 2026-05-04 6:45 PM  
**To** SheffieldPlan <sheffieldplan@sheffield.gov.uk>  
**Cc** [REDACTED]

 2 attachments (2 MB)

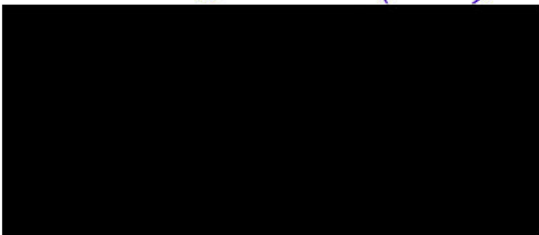
Our letter to Council & Inspectors.pdf; Our letter to Council & Inspectors.docx;

External email

Dear Sheffield Planning,  
Please find attached our comments and input to the period of consultation which is due to complete to-morrow, 5<sup>th</sup> May 2026.  
Our input is attached as both a word document and a PDF.

Yours Faithfully,

*Andrew Robinson*  
*Olwen Robinson (Mrs)*



[REDACTED]

4<sup>th</sup> May 2026

Sheffield Planning Service,  
5th Floor,  
Howden House,  
SHEFFIELD  
S1 2SH,

Dear Sheffield Planning Service,

**The Sheffield Plan - Major Modifications**  
**Grenoside, Ecclesfield, Chapeltown**  
**Sites NES37, NES38, NES39, CH05 – For Housing**

We write in response to the proposed “Major Modifications” suggested by the Inspectors to the Sheffield Plan and the Planning Service response. We note with major disappointment that the modifications are actually a relatively small number of minor amendments proposed by the Inspectors which are quite simply insignificant in the whole scheme. The heading of this process “Major Modifications” does not represent what is taking place but Major Amendments are what are required.

We still believe that the whole “plan” is very poorly thought out and the way it has been presented to the people of Sheffield is shameful. It would seem that nothing has been learned from the fiasco of the Tree Scandal. We are very fortunate to have been able to rely on our local group CEG who have been able to advise us on what is going on and they have arranged many briefing sessions over the period March 2025 to April 2026.

The City Council is supposed to represent the people of Sheffield and to consult with the people it is elected to serve and not merely to impose an ill thought out policy which does not serve the best interests of the people of Sheffield. In particular, we wish to make the following points: -

**1. Overall Points**

- The City Council has still not proved that the Special Case required for development on Green Belt land has been met under any of the tenets set out by Green Belt policy.
- The plan is based on a policy first developed in 2019/20 and was the basis of the 2023 submission. It has actually been without revision to account for the changes in the intervening time, particularly brought about by Covid, and the changes in peoples’ lives and work emanating from post Covid lifestyles.

- The Council has totally failed to carry out a full and accurate up-to-date review of available brown field and other non-Green Belt land available. Indeed, the information used in this plan actually dates back to the 2019-20 work and is totally out of date. Current information on sites available now has been offered to the Council including EXAM 141 and much more recent work by CEG. This was treated by the Council and the Inspectors as “windfall” and therefore ignored as has the much more recent work. This fails totally to prove that any Special Case exists.
- The Council has not properly identified vacant properties which can be brought back into use without major construction work. It appears that the numbers could be at least 1,500 for the total of Council Houses and previous Council Houses now managed by Housing Corporations plus 700 private rental houses. The potential total of 2,200 is significant.
- The council has provided no evidence that the so called “brown field first” policy is anything other than lip service.
- The council has failed to reconsider the appalling inequality of allocation of “Green Belt development sites” into only two post code areas of Sheffield, S13 and S35, without even assessing whether those areas could have any chance of absorbing 50% increases in population. Our information is that these sites cannot take anything like this increase in housing.
- Over a period of at least 16 months, in spite of a huge number of documents, the council has totally failed to address any of the extremely major concerns expressed at the Inspectors meetings about roads, congestion, flooding, environmental impact and mental health of residents particularly in the proposed development in S35 “plans”. One of us was present at those meetings and spoke to the Inspectors and nothing important has changed.
- The council has failed to address the issues raised about loss of productive farmland and its impact on food sustainability and the loss of livelihood for its own tenant farmers at Town End Farm in Ecclesfield.
- The Council has also almost refused to answer the many serious questions asked legitimately in Council meetings.

In a response on behalf of the Prime Minister, we received the following comment: “The National Planning Policy Framework (NPPF) is clear that planning policies and decisions should contribute to and enhance the natural and local environment by recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services - including the economic and other benefits of the best and most versatile agricultural land.”

In addition, the Prime Minister spoke in the House of Commons on 7<sup>th</sup> January 2026 and stated “We will not plough through farmland : we will make sensible proposals to build houses.” The Sheffield Plan with the modifications takes no note of these statements.

If there is a need for more housing in Sheffield, once all available non-Green Belt has been exhausted, we are perfectly happy to accept that each area of the City should bear its fair share of building in the Green Belt once that has proved to be necessary according to the Golden Rules. However all existing empty properties and brownfield sites should be developed first on a fair and equal basis throughout the City. Green Belt land should only be

developed as a last resort after every other reasonable alternative has been exhausted and the use of the land should be carefully planned as is the requirement. This is the primary purpose of Green Belt.

As the home of Ethel Haythornwaite, campaigner and pioneer of the whole concept of Green Belt for the UK, Sheffield should not throw away Green Belt which it has used as its Golden Frame for many years. The principle is still incredibly important for our country. **Once Green Belt has been developed it is lost forever.**

## **2. Specific Evaluation of Current Proposals Housing in Grenoside, Ecclesfield and Chapeltown NES37, NES38, NES39, CH05**

These 4 sites have been treated individually as though they are in completely separate places: this is either because the planning department is so ignorant of their location that they are unaware (of all the planners and staff who attended consultations in June 2025, Chapeltown Methodist Church and Grenoside C of E Church, only 2 claimed to have visited before). Or, it has been deliberately done so the people are unaware. So the facts are that the span across the sites is just 2.2Km. The sites are almost completely in Grenoside and Ecclesfield. They all use the same roads and all sites are higher than the flood area of lower Ecclesfield. The pressure on Schools, surface water run-off, Medical Services, already congested roads, air pollution, limited access to public transport are all in the same place. The promise is for

**“Master-Planning**, either before or with the Planning Permission process”.

For so many houses in one place, this is roughly a 50% population increase, and no proper planning has taken place, either of the very valuable Green Belt being lost or the consequence of such a massive change. The reduction in the “Major Modifications” has been to reduce the proposed houses by 99, so from 1,494 to 1,395, insufficient to make any real change to the serious negative effect on the whole area.

Covering all the 4 proposed housing sites, the main issues remain as follows:-

### **2.1 Destruction of Green Belt, wildlife, important trees, hedgerows, in many cases land which has been laid out in the same way for centuries.**

These 4 sites have been deliberately protected to achieve the 5 principles of the Green Belt and have been extremely successful. Indeed, NES37 was so important to prevent from use for housing that Wortley Rural District Council purchased the land in the late 1930s at the time the Parson Cross/Southey/Doe Royd housing estate was being planned. That is why it is still Council owned and is an impressive and successful farm.



Figure 1 NES37

Each of the sites will need careful spacing around ancient hedgerows, important and ancient trees and groups of woodland which will reduce significantly the available land for building.

As an example, Work on NES37 indicates the land has key trees, hedgerows, flora and fauna and animals and birds. The 'exceptional circumstances' which have to apply to the release Green Belt cannot be used to justify 'wholly exceptional circumstances' which exist here. The land is primarily grassland for grazing for cattle and some horses and also for arable cereal

farming. The land has significant trees, and hedgerows, many with the characteristics of ancient hedgerows. There are two areas of deciduous woodland and over 150 trees, 50 which are ancient. Species include Oak, Ash, Hawthorne, Common Snowberry, Hazel, Wild Cherry, Sycamore, A stream runs through the land which can increase dramatically in wet weather from a width of 2 metres to flooding up to 10 metres wide. Old maps and diagrams indicate that the land has been farmed at least since the 17<sup>th</sup> century with the line of existing hedgerows being in the same places so at least the same age. The land is also home to a wide range of animals and birds with foxes having Dens and badgers sets on the land. The trees and hedgerows will need to be carefully retained and an analysis from detailed walking of the land indicates that the necessary



Figure 2 Ancient tree on NES37



Figure 3 Typical View

retention of ancient trees and hedgerows with appropriate scaling indicates that a minimum of 7 hectares and up to 18 hectares of the total available land would need to be classed as unavailable using the appropriate spacing which would need to be applied. The required master- planning of the site will need to be carried out to confirm the detailed loss of available area.

Key animal species on the land include Badger sets, Fox earth dens, hedgehog, rabbit, deer, bats, a range of birds including

sparrow, nut hatch, goldfinch, wagtail, blue tit, wood pigeon, carrion crow, wren, chiff chaff, blackbird, dunnock, song thrush, robin, great tit, rook, heron, magpie, collar dove, pheasant, sparrow hawk, owl, green parakeet, sea gull, swallow and duck.

## 2.2 Removal of Farming Land.

Nearly 70% of the land is actively farmed and with the recent DEFRA analysis of Agricultural Land Classification (ALC) dataset identifying areas of Best and Most Versatile (BMV) agricultural land (Grades 1, 2 and 3a), the proposal to use most of this land is totally UNSOUND, and also is completely against Government policy as outlined by the Prime Minister.

## 2.3 Impossible access proposals to the local roads.

The proposed access to local roads has been looked at from a safety, access and traffic flow point of view. The access and state of roads has also been studied for CEG by Aprica Ltd.



Figure 4 Proposed access point to The Wheel for NES37

for all the 4 housing sites and the employment sites in Chapeltown. The conclusions for all are quite similar as follows: -

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

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

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

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

## 2.4 Local Roads Completely Unable to Deal With Increases in Traffic.



Figure 5 Queues on Nether Lane outside busy times

Similar to the point above, the roads in Grenoside, Ecclesfield and Chapelton are already running at or above maximum capacity at many times of the day and Sheffield Council has never assessed the traffic levels properly. The roads which are already at the widest they can be and for which no realistic widening to improve traffic flow include:- Salt Box Lane, Wheel Lane, Creswick Lane, The Wheel, Townend Road, Yew Lane, Church Street, Mill Road, Ecclesfield Common, Chapelton Road. Realistic evaluation is likely to make it very clear that the expected additional traffic cannot possibly be accommodated and the scope for widening or improving roads is almost non-existent. In addition, the road which will be significantly affected by the CH05 housing construction, Nether Lane, is

already clearly over busy for around 3 hours every working morning and 4 hours every working evening – the main route to the M1. The effect on Ecclesfield

Academy, the largest secondary school in Sheffield will be a disaster, both during construction and afterwards.

**2.5 Other Services.** It is understood that the provisional arrangements for GP services for 1.395 additional houses is for a single additional GP. No other increases in services such as elderly care, children care, adult support appear to have even been discussed. Public transport is very poor in the whole area, for example, Wheel Lane, The Wheel, Townend Road, Townend Road have 4 buses per day in the week and none over the weekend. There is also no easy link either to train or tram services.

**2.6 Flooding.** All the 4 sites are above the flood area, Class 3a Flood Zone, in Ecclesfield Park and the surrounding houses on Ecclesfield Common, Church St., Whitley Lane, Mill



Figure 6 Mill Road Flooding

Road, Linden Road, Linden Court. There have been floods in these areas on 6 occasions since the flooding in 2007. Flood analysis has only been carried out for each of the sites but the work to ensure surface run-off does not increase has been limited to ponds which then drain into existing streams, brooks and waterways. All of these, at least 8 in total, drain into the flooding area which then drains into Blackburn Brook.

Without a major and strategic plan involving Yorkshire Water, the consequence will without any doubt increase the flood risk in lower Ecclesfield.



Figure 7 Ecclesfield Common Flooding

### 3. Overall Conclusion

- We believe that the additional proposals for the additional requirements all in the Green Belt are completely UNSOUND in almost every respect.
- The work to justify this has not been done and the proposals are so bad that, if they proceed, the results will be a monuments to the failure of Sheffield Planning Department to plan professionally: They will stand as a mark of failure for several generations.
- Sheffield Plan should be paused pending a thorough review and revision to update the actual need for housing in Sheffield, which has a falling birthrate, assessment of available properties to bring back into use, a full review of available non-Green Belt sites/Brown Field sites and a reallocation citywide of any further need for development.
- A way forward now should be to give approval to the plan proposed to Government in 2023, most of which is on hold and can make important progress right now. The additional requirement from Government and the Government Inspectors communicated in February 2025 must be put on hold until a further thorough review of the additional housing and employment sites required is looked at and the genuine options of fulfilling that requirement is looked at in detail, the “master planning” with proper evaluation and real intelligent planning, involving the people of Sheffield.

Yours Faithfully

*Andrew Robinson*  
*Olwen Robinson*

A. C. Robinson  
D. O. Robinson (Mrs)

Copied to:- The Government Inspectors; Dr. Marie Tidball M P; Tom Hunt Leader of Sheffield Council



4<sup>th</sup> May 2026

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- The work to justify this has not been done and the proposals are so bad that, if they proceed, the results will be a monuments to the failure of Sheffield Planning Department to plan professionally: They will stand as a mark of failure for several generations.
- Sheffield Plan should be paused pending a thorough review and revision to update the actual need for housing in Sheffield, which has a falling birthrate, assessment of available properties to bring back into use, a full review of available non-Green Belt sites/Brown Field sites and a reallocation citywide of any further need for development.
- A way forward now should be to give approval to the plan proposed to Government in 2023, most of which is on hold and can make important progress right now. The additional requirement from Government and the Government Inspectors communicated in February 2025 must be put on hold until a further thorough review of the additional housing and employment sites required is looked at and the genuine options of fulfilling that requirement is looked at in detail, the “master planning” with proper evaluation and real intelligent planning, involving the people of Sheffield.

Yours Faithfully

*Andrew Robinson*  
*Olwen Robinson*

A. C. Robinson  
D. O. Robinson (Mrs)

Copied to:- The Government Inspectors; Dr. Marie Tidball M P; Tom Hunt Leader of Sheffield Council

**REF5.0330**

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Modification Plan MM410 (SES29) and MM411 (SES30)

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From [REDACTED]  
Date Mon 2026-05-04 6:47 PM  
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

[REDACTED]

I am making comment on MM410 (SES29) and MM411(SSES30). The points below are of main concern:

These greenbelt areas are a known area for a diversity of wildlife and wildlife habitat that is used and enjoyed extensively by the community. My understanding from different documentation, that is not always easy to read and fully understand, is that any new development needs to show an increase in biodiversity. The modification plan states where feasible Biodiversity Net Gain should be delivered on site. This wording for me does not indicate a sound footing in meeting legal requirements especially in light of the councils report stating modifications leading to permanent loss of greenbelt land make landscapes and townscape environments more negative, biodiversity slightly worse along with transport due to increased vehicle usage and access.

Both areas of development are reliant on modifications to existing roads and junctions. Both mention the junction of Beaverhill Road and Retford Road needs major modification. Using this road network every workday I already have first hand accounts of how busy and congested these are and the delays encountered through gridlock. Another 800+ houses on each of these sites, with additional secondary school and burial site for SES30, will have an extremely negative affect not only on congestion but also air quality. Beaverhill Road is already the site of a secondary school and Handsworth Grange Road which runs from Beaverhill Road is often used as a 'rat run' at busy times and I can only see this increasing. Handsworth Grange Road also has a primary school located on it. This extra traffic increases danger and risk to the younger children coupled with a decrease in air quality. These roads are surrounded by existing developments and have been problematic for a number of years including currently subject to flooding and closure on a number of occasions so I am unsure that suitable access for a development of the scale planned has been shown.

Greenbelt land as I understand it should only be released in exceptional circumstances. The exceptional circumstances for releasing this land include a school and burial ground which is mentioned for MM411 (SES30). The modification plan states land is safeguarded for these but then also states that any alternative proposals in relation to this will be considered as part of the first review of the plan if necessary. If those uses don't happen the justification for releasing the Green Belt surely disappears however the land will already be gone along with the initial exceptional circumstances given and the soundness and justification rings hollow for this aspect of the modified plan.

Both sites are subject to further exploration and risk assessment due to previous coal mining and additionally for MM410 (SES29) for contamination of land. If these assessments give concerns about the use of certain areas of this land and plans need to be scaled back, or development costs increased then requirements in terms of houses will not be met. How can

this be a sound plan if there is uncertainty about the number of houses that can be built upon it?

There appears to be a lot of vagueness and evidence of how the need to use this greenbelt land cited in MM410 (SES29) and MM411 (SES30) will effectively meet the requirement in the modified plan. I consider this plan to be unsound and not fitting with national policy and would request these are removed from the plan and retained as Green Belt.

Thank you.  
Michael Yates

Sent from my devices

**REF5.0331**

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## Formal objection to Main modifications

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From [REDACTED]  
Date Mon 2026-05-04 7:21 PM  
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Sir/Madam,

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

My objection is specifically that these Main Modifications are unsound, as there is no clear or deliverable plan for the infrastructure required to support the proposed development, particularly in relation to healthcare and transport.

From personal experience, accessing local GP services is already extremely difficult. I have frequently found myself around 40th in the phone queue just to try and get an appointment. I also submitted a Freedom of Information request to the NHS, and the response confirmed what many local residents already suspected: GP surgeries in the area are already at or beyond capacity. Crucially, there is no confirmed or funded plan in place for how these services will cope with the significant increase in patients that would result from these developments. This information only came to light after the previous consultation deadline had closed, meaning it has not been properly considered.

Infrastructure in the area is already under significant strain. Since the nearby Waverley development, local roads have become heavily congested. Residential streets, including the Ballfield estate, are now used as rat runs, with vehicles often speeding past multiple schools. Morning rush hour and school run traffic regularly leads to blocked roads, and public transport provision is limited.

The proposals do not present a credible or realistic plan to deal with these issues. The suggested access arrangements for the new housing are inadequate and do not reflect the current pressures on the road network.

The loss of Green Belt land is also a serious concern. I regularly use this green space for exercise and to support my mental wellbeing. It provides a valuable area to unwind and is home to a wide range of wildlife, including foxes and various bird species. This space is an important part of the local environment and community.

In summary, the Main Modifications are unsound because they fail to demonstrate that the development can be supported by adequate, deliverable infrastructure. I respectfully request that these sites are removed from the plan and remain designated as Green Belt.

Yours faithfully,  
Alex Hobson

**REF5.0332**

## Objection CHO3

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**From** [REDACTED]  
**Date** Mon 2026-05-04 7:32 PM  
**To** SheffieldPlan <sheffieldplan@sheffield.gov.uk>

 1 attachment (432 KB)

Emma - MM - CH03 Objection.pdf;

External email

[REDACTED]

Please find attached objection for CHO3.

Kind regards  
Emma Ozenbrook

Sent from my iPad

**REF5.0333**

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**Unanswered questions from 10 months ago re unfair and unjust decisions re Handsworth S13 proposal for building on Green Belt space.**

---

From [REDACTED]  
Date Sun 2026-05-03 7:40 PM  
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>  
Cc [REDACTED]

External email

Dear Planning Department

I hope you are well.

I am writing to request, for the third time, responses to my very valid and reasonable questions and points raised in emails below.

The only response I received which could barely be called lip service, was quoting 'Unfortunately it is not practical for us to respond directly to specific questions' and forgive me, but that feels like a complete cop-out in order to steamroller this unfair, unequal, unjust and unsubstantiated decision through at all costs without regard for anyone who will have to live with the impact. Albeit most probably a shorter life because of it.

I would be grateful if you could kindly give my email the consideration it deserves, particularly by responding properly and fully to questions raised on 9 July 2025.

Thank you.

Pamela Robinson

Begin forwarded message:

**From:** [REDACTED]  
**Date:** 1 February 2026 at 19:24:50 GMT  
**To:** sheffieldplan@sheffield.gov.uk, [REDACTED]  
**Subject: Decisions re Handsworth - proposal for building on Green Belt space.**

Hello

I hope you are well

I am still waiting for a full explanation in response to my email below sent last July and wish to also add the following, in respect to the most recent decision by Government Inspectors to give the green light to this appalling proposal.

I do not know how anyone on any planning committee, with even half an ounce of common sense or sense of fairness and decency cannot see that it is wholly unfair and unjust to take away practically all of the tiny amount of green space in one of the already poorest communities in Sheffield. Would you agree to this proposal if it were on your doorstep?

I really hope that those who are making such decisions find their conscience at last or that karma does it for you.

Yours faithfully

Pamela Robinson

**From** [REDACTED]  
**Date:** 9 July 2025 at 22:18:38 BST  
**To:** sheffieldplan@sheffield.gov.uk  
**Subject: Fwd: Handsworth - proposal for building on Green Belt space.**

Hello

I hope you are well.

I moved to Handsworth 30 years ago. [REDACTED]

[REDACTED] When I moved, parking was available on the road outside my flat, and Finchwell Road was relatively quiet.

Over the years I have endured double yellow lines and traffic lights installed directly outside my flat on both sides, several large fast food outlets straight across from me as well as a mobile phone mast, telecom boxes directly outside my home, a large housing estate built on the Quarry Road site, houses built at the side of me on the site of the school and the traffic noise and fumes are frankly stifling, both directly outside my home and the surrounding area.

The very small amount of green space available in Handsworth is immensely precious and extremely well used by residents.

Please can you tell me how on earth anyone in the planning department thinks it is fair, just or reasonable in any way, to take the majority of our green belt

space away in Handsworth? What was the rationale behind the shocking and unfair proposal? Why were residents not properly informed of the proposals and what surveys have been carried out to assess the potential impact on the health, well being and quality of life for residents and the already stretched infrastructure?

I would appreciate your answers to my questions as quickly as possible and please keep me up to date on this very important matter.

Many thanks

Pamela Robinson

Sent from my iPhone

**REF5.0334**

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**Information Request: Archaeological Assessment for SES29 (Handsworth Hall Farm)**

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From [REDACTED]  
Date Mon 2026-05-04 10:16 AM  
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Sheffield plan.

I am writing to request an update regarding the archaeological assessment requirements for the **SES29 Handsworth Hall Farm** site allocation in [Handsworth](#).

As this site has been identified within the [Sheffield Plan](#) as being in an area of archaeological interest, I would appreciate clarification on the following:

- **Current Assessment Status:** Has a [Heritage Impact Assessment](#) or Desk-Based Assessment (DBA) been completed for the 56.92-hectare site to date?
- **Required Fieldwork:** Will a field evaluation (such as geophysical survey or trial trenching) be required in accordance with the [SYAS Standards for Archaeological Field Evaluation 2026](#) before the plan's adoption or a planning decision?
- **Mitigation Strategy:** Are there specific recommendations already in place for preserving identified assets in-situ or through a programme of targeted mitigation?
- **Access to Reports:** Could you please provide links to any published technical reports or scoping studies specifically covering the archaeological potential of SES29?

Given the current [Main Modifications consultation](#) closing on **5th May 2026**, this information is vital for understanding the constraints on this mixed-use development.

Thank you for your assistance.

Best regards,

Paul Talbot  
[REDACTED]


**REF5.0335**

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**letter commenting on the main modifications for site CH03 in the local plan**

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**From** [REDACTED]  
**Date** Mon 2026-05-04 7:37 PM  
**To** SheffieldPlan <sheffieldplan@sheffield.gov.uk>

 1 attachment (23 KB)  
my letter for main modifications.docx;

External email

Hello,

Please find attached my letter/comments regarding the main modifications to the development of site CH03 (Warren lane and M1) in the local plan.

I hope the inspectors are able to read it.

Mant thanks

Nicola Ley

\*\*\*\*\*  
\*\* \*\*\*\*\*

This message may contain confidential information. If you are not the intended recipient please:  
i) inform the sender that you have received the message in error before deleting it; and  
ii) do not disclose, copy or distribute information in this e-mail or take any action in relation to its content (to do so is strictly prohibited and may be unlawful).  
Thank you for your co-operation.

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For more information and to find out how you can switch visit [Joining NHS.net Connect - NHS.net Connect Support](#)

## **Representation to Sheffield Local Plan Main Modifications – Objection to MM459 (Site CH03)**

**Site Reference:** CH03

**Location:** Land bordered by M1, Thorncliffe Road, Warren Lane and White Lane, S35

This is my formal objection to the Main Modification MM459 relating to the allocation of Site CH03 as a General Employment Area.

Although my objection specifically relates to the above mentioned site allocation, CH03 cannot be assessed in isolation as it forms a cluster of allocations with CH04, CH05, NES36, NES37, NES38 & NES39. These proposed Greenbelt sites create a significant outward expansion of the settlement boundary and result in a continuous tract of Greenbelt loss.

Whilst I recognise the need for Sheffield to grow and develop, the requirement to develop site CH03 into employment land is not clearly justified in terms of local unemployment and demand for this type of premises.

There is a surplus of unused and available B2 and B8 premises in the local area that are empty and have been for some time, outlining that the demand for this kind of development is low and not needed in the current climate. The neighbouring industrial estates/business parks including Thornecliffe business park, 35A business park and the Winston business park (all within 0.5 miles of Warren lane) have multiple office and, industrial and warehouse accommodation (up to 7,129 Sq ft) empty and available to let. Smithywood business park currently has 6 vacant employment sites that are also available re-enforcing that this area is saturated and the removal of further greenbelt land for this type of development simply cannot be justified.

I consider, the proposed modifications still render the allocation of site CH03 unsound when assessed against the tests of soundness set out in the National Planning Policy Framework—namely that the plan must be justified, effective, and consistent with national policy.

### **Impact on Residential Amenity**

The site is in close proximity to existing residential properties, particularly along Warren Lane where it borders the rear of the local residents properties. Although the modification introduces a “zonal approach” and requires buffering through Class E(g)(iii) uses and landscape buffers, this is unlikely to adequately mitigate the impacts of B2 (general industrial) and B8 (storage and distribution) uses which are often tall, multistorey buildings that will tower over the adjacent area.

The site consists of rising ground and it overlooks existing residential properties, because of the elevated nature of the ground it is difficult to see how the industrial development could be effectively screened from view without complete flattening of the site and the excavation of 1000's of tons of possibly contaminated land. Even if this was achieved, a development of more than 1 storey would not be screened from the residents or shield the residents from the employers being able to see into their homes.

In the construction stage the air contamination and dust that would arise from such a large development would pose a substantial risk to the resident's health and there is no clear mention of how this will be addressed in the local plan or its modifications. Are the residents simply just unable to use their garden whilst the premises is being built to avoid inhalation of toxic substances and dust? Simply, saying it needs to be addressed at planning application stage is not acceptable when there are significant risks for long term health problems.

Once up and operational the impact of class B2 and B8 employment premises in such close proximity has also not been satisfactorily addressed. I do not believe a small buffer zone will satisfactorily shield the rear facing bedrooms on Warren lane from the adjacent light and noise pollution that will be operational 24 hours a day. We already suffer from noise and pollution from the adjacent M1, and light pollution from the nearby EVRI centre in Hoyland and the adjacent Thorncliffe industrial estate. Any further pollution to the local residents will be extremely detrimental to their physical and mental well-being.

The reliance on layout-based mitigation at the planning application stage introduces uncertainty, and does not provide sufficient assurance that unacceptable impacts on residential amenity can be avoided. The allocation is therefore not justified in this location.

### **Highway and Transport Impacts:**

The modification confirms that access will be required from Thorncliffe Road and that contributions may be needed for wider network improvements. However, there is insufficient evidence at this stage to demonstrate that the local and strategic highway network can accommodate the scale and type of traffic likely to be generated by a 17.26-hectare employment site, particularly for B8 uses which are associated with high levels of HGV movements.

Access to the site entrance will be gained via the M1, Stocksbridge bypass, Warren lane or by coming up Thorncliffe road from the old cart road.

This segment of the M1 and the neighbouring junctions is an accident hotspot and frequently sees closures due to incidents. This often impacts traffic through Chapeltown and Warren lane as drivers are diverted from the Motorway. The local transport network is unable to cope with additional commuter and HGV transport.

Stocksbridge bypass is often tail backed with traffic in both directions and traffic through Chapeltown is always heavy at rush hour. In view of this, Warren lane is often used as a rat-run for faster access to the M1 and in rush hour can be dangerous as people do not abide the speed limit (20mph) as they are using the road to save time. The road itself is hazardous with parked cars either side and a blind bend in the middle. There is no doubt that the addition of such a large employment premises and the associated employees commuting to the site will not be sustainable on the local roads.

The use of public transport is also unlikely due to the restrictions on local availability as it is limited and unreliable.

Service 35 makes 12 journeys between approx. 06.00 and 18.00, but only 3 on Saturdays the nearest bus stop for this is approx. 200 metres distant, with no foot path.

Service 201 this makes approx. 10 journeys per day at irregular intervals between approx. 07.00 and 18.00 Monday to Saturday, the nearest bus stop is over 500 metres distant down quite a hill, with no foot path for half that distance, in bound services are frequently delayed due to traffic queues on the A616.

Service 2/2a these services run past the east end of Warren Lane, at approximately hourly intervals from about 05.30 to 22.00 approx 20 services in total, less at weekends.

The railway station is about 2km distant in the valley. From the above it will be seen that public transport is not a convenient option.

Without firm, deliverable mitigation measures identified, the allocation is not effective and may result in severe residual cumulative impacts on the transport network, contrary to national policy.

### **3. Loss of Green Belt and Inadequate Compensation**

The site has been released from the Green Belt, yet the proposed compensatory improvements are not clearly defined or secured. The requirement to deliver improvements identified in a separate document lacks certainty and enforceability.

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

The environmental and amenity value of the existing Green Belt land—particularly in preventing urban sprawl and safeguarding the setting of nearby communities—cannot be adequately replaced through off-site or unspecified measures.

This site supports a variety of wild life such as skylarks, kestrels, shrikes, magpies and owls among the bird life, and bats, badgers, small deer etc. amongst mammals ( We occasionally get bats in the house, which I have to catch and liberate). It is difficult to see how the CH03

proposal can maintain the current levels of biodiversity. Wild life corridors will be of little help, when one considers the arc of other proposed developments alongside the M1.

The Chapeltown, Ecclesfield and Grenoside (CEG) group have identified brownfield sites whose combined area (200+ hectares) exceeds that of the proposed greenbelt land, and the council's brownfield first policy should ensure this is ALL utilised before removing the land from the greenbelt for development. There is no proof of exceptional need to develop this site and this is especially important when considered in conjunction with the Hesley Wood and Smithy Wood developments as the devastating loss of greenbelt land and the destruction of the local wildlife and ecosystem over such a small area cannot be justified. No compensation in the local areas can replace this established wildlife.

The allocation is therefore not justified.

#### **4. Environmental Constraints and Deliverability**

The site is subject to a wide range of constraints, including:

- Flood risk (as identified in the Level 2 Strategic Flood Risk Assessment)
- Presence of Northern Powergrid infrastructure
- The Tankersley railway tunnel running beneath the site
- Potential land contamination and proximity to a historic landfill
- Ecological and biodiversity requirements
- Archaeological interest

Taken together, these constraints and the modification to remove the triangle of land adjacent to the old peoples home significantly reduces the net developable area to approx. 11 hectares and introduces uncertainty regarding the viability and deliverability of the site.

The plan does not demonstrate that development can be viably delivered within the plan period, meaning the allocation is not effective.

#### **5. Over-Concentration of Industrial Uses Near Existing Communities**

The allocation represents an intensification of industrial activity in close proximity to established residential areas. This raises concerns about cumulative impacts on health, wellbeing, and quality of life for existing residents.

The plan does not sufficiently demonstrate why alternative, less constrained or less sensitive locations could not meet the identified employment land need, and therefore the allocation is not justified.

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### **Conclusion**

For the reasons set out above, Main Modification MM459 and the allocation of Site CH03

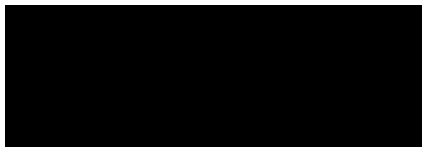
are considered unsound. I respectfully request that the Council and Inspectors reconsider the allocation of this site for general employment use.

Without such changes, the allocation risks causing significant harm to residential amenity, the local environment, and infrastructure, while failing to meet the tests of soundness.

Also I would clearly like to register my support for the work undertaken by the Chapeltown, Ecclesfield Grenoside Group, and endorse their submission

Yours faithfully,

Nicola Ley



**REF5.0336**

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## Objection to SS19

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From [REDACTED]  
Date Mon 2026-05-04 7:44 PM  
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Strategic Planning Team,

I am writing to raise objections to the proposed Main Modifications to the Sheffield Local Plan, particularly those relating to site SS19. While I understand the importance of having a deliverable and robust plan, a number of these changes weaken key safeguards that are necessary for public safety, legal compliance, and a fair distribution of development across the city.

For these reasons, I do not believe the Plan, as modified, meets the tests of soundness set out in paragraph 36 of the National Planning Policy Framework (NPPF), specifically in terms of being justified, effective, and consistent with national policy.

My concerns are outlined below.

### **MM7**

This modification narrows the stated purpose of the Green Belt by focusing mainly on its role in supporting urban regeneration, while leaving out the full range of purposes set out in national policy. This creates a misleading picture and risks weakening the overall role of the Green Belt in preventing urban sprawl and protecting the countryside. By presenting regeneration as the primary function, it could be used to justify further releases in future. The wording should reflect all Green Belt purposes as defined in the NPPF.

The Integrated Impact Assessment Addendum also acknowledges that development of SS19 would result in lasting negative impacts on landscape character and the environment, with mitigation unlikely to fully address these effects. This further calls into question whether the modification is justified.

### **MM10, MM11, MM90–MM93**

The Plan relies heavily on windfall sites, with 7,475 homes (around 19% of supply) expected from sites that are not specifically allocated. This introduces a high level of uncertainty, as these sites are not plan-led and cannot be guaranteed to come forward.

In addition, the housing supply only exceeds the identified requirement by 298 homes across the entire plan period — less than a 1% buffer. This leaves no meaningful flexibility if delivery falls short, particularly given the reliance on uncertain windfalls. Any under-delivery could result in the Plan failing to meet its targets.

### **MM18**

SS19 is expected to come forward early, yet there is already a projected shortfall in secondary school places in the S12 area until at least 2028/29. Proposed mitigation, such as a city centre school, is unlikely to be delivered in time to meet peak demand.

There is also no clear plan for post-16 provision, despite rising demand, and south-east Sheffield currently lacks this infrastructure. Primary provision is already under strain, with nearby schools oversubscribed. Given the scale of development proposed (around 1,600 homes in S12), the absence of clear education infrastructure planning is a significant concern.

### **MM19**

The phrase “include consideration” is too vague and does not guarantee delivery of healthcare infrastructure. There is no firm commitment to new facilities, nor clarity on where they would be located.

This is particularly problematic for S12, which is expected to accommodate substantial growth but is only allocated minimal additional healthcare capacity. Without stronger commitments, this risks worsening existing health inequalities. The Impact Assessment also recognises that development may reduce amenity and negatively affect wellbeing, particularly where Green Belt land is lost.

### **MM20**

The wording “wherever practicable” lacks clarity and does not provide assurance that necessary transport improvements will be delivered. This weakens the Plan’s effectiveness and its ability to secure sustainable development.

In S12, the scale of proposed housing will significantly increase traffic, yet there is no clear, coordinated transport strategy to address cumulative impacts. Existing public transport is already under pressure, despite being described as high frequency. Without firm commitments and detailed mitigation measures, congestion and safety issues are likely to worsen.

### **MM127 & MM128**

The Plan suggests that windfall Green Belt sites could deliver up to 50% affordable housing, but available evidence indicates this is unlikely, with sites such as SS19 expected to achieve closer to 30%.

This gap between policy ambition and realistic delivery undermines the credibility of the Plan. It also relies on uncertain windfall sites to meet affordable housing needs, despite clear evidence that the majority of need in Sheffield is for affordable homes. This approach is not well supported or justified.

### **MM224 & MM227**

Although these modifications acknowledge site constraints, they do not appear to include any recalculation of housing numbers to reflect reduced developable areas. This raises concerns that overall housing delivery is being overestimated.

Where buffers or constraints reduce capacity, housing numbers should be adjusted accordingly. The absence of this reassessment undermines confidence in the Plan's delivery assumptions.

### **MM429 (SS19)**

SS19 has significant constraints, including flood risk, ecological considerations, and access limitations. Despite this, it is not included in the recalculations referenced in MM224 and MM227. This inconsistency suggests that reductions in capacity are not being applied uniformly across sites.

There are also cross-boundary concerns with a neighbouring proposed site in North East Derbyshire. Both sites share the same developer, yet the neighbouring authority has deemed its site unsuitable due to similar constraints. If both were developed, this would create a large, continuous block of development, conflicting with Green Belt purposes such as preventing sprawl and maintaining separation between settlements.

There appears to have been limited coordination between authorities on these cumulative impacts, raising concerns about compliance with the Duty to

Cooperate. Overall, this weakens the justification for retaining SS19 within the Plan.

### **Conclusion**

In summary, the proposed Main Modifications do not adequately resolve the issues raised during earlier consultations and hearings. Many of the changes are vague and lack the detail needed to demonstrate that they are deliverable, proportionate, and effective.

For the Plan to be considered sound, further changes are needed — including a reassessment or removal of SS19 — to ensure that it is realistic, fair, and aligned with national policy.

Thank you for the opportunity to comment. I urge the Inspectors and the Council to reconsider these modifications to ensure the Local Plan is robust and fit for purpose.

Yours sincerely,  
Mrs Rachel Develin

**REF5.0337**

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## Objection to Main Modifications of NES36

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From [REDACTED]  
Date Mon 2026-05-04 7:51 PM  
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>  
Cc [REDACTED]

 1 attachment (69 KB)

Andrea Smith - May 2026 - Main Modification Objection.pdf;

External email

Dear Sheffield Plan

Please find attached objection to the Main Modifications of site NES36.

This document is sent on behalf of **Mrs Andrea Smith** [REDACTED]

[REDACTED] Who has asked me to send this for them as I am helping them with email communication.

Kind Regards

Bec Nutton  
[REDACTED]  
[REDACTED]

*Receiving this email outside of normal working hours? Managing work and life balance is unique for everyone. I have sent this email at a time that works for me. Please respond at a time that works for you.*

**Andrea Smith,** [REDACTED]

**Objection relating to Main Modification relating to site NES36 (Smithy Wood)**

In the original site assessment, NES36 was identified as having a number of significant constraints. These included major impacts on landscape, ecology, transport, air quality and contamination. The reduction in site size makes them more acute. There is now less space to accommodate mitigation, meaning impacts are pushed closer to sensitive receptors. A site that was already constrained has become more constrained.

The houses at 115 and 119 Jumble Lane directly adjoin this site. The Main Modifications fail to address the impact of this allocation on nearby residential properties. The revised site boundary is likely to bring development closer to the site boundaries, and therefore the residential dwellings, as there is much less developable area, yet there is no requirement within MM350 to assess or mitigate noise, traffic, lighting or general disturbance.

The Main Modification 459 for site CH03 introduces a clear zoning approach, requiring less intrusive employment uses to act as a buffer between large-scale warehousing and residential areas. This demonstrates that the Plan recognises the need to manage the impacts of employment land through separation and land use gradation. No equivalent approach has been applied to NES36, despite similar impact considerations.

Given the existing character of Smithy Wood Business Park, the site is likely to be used for logistics/warehousing; Smithy Wood Business Park already has many logistics sites and has recently had permission approved for a HGV refuelling station. Typical buffer expectations between logistics sites and residential housing would be an absolute minimum of 50-100m and then only when strong mitigation is in place (acoustic barriers, building shielding). Much larger buffer zones of 250m + would be expected where there is nighttime HGV use. Which has not been specified in the Main Modification for this site.

Living near industrial sites can have real, measurable health impacts on nearby occupants including respiratory disease and cardiovascular problems, increased risk of cancers, sleep disruption, anxiety and long-term stress.

In summary, as there are only a small number of houses adjoining this site it seems that their existence has been entirely ignored, the proposal does not consider the impact on adjoining residential properties. Just because there are fewer of us does not mean we should be treated any less favourably than residents adjoining other sites.

For these reasons, I object to the Main Modification and the continued allocation of this site.

**REF5.0338**

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**objection to the Main Modifications of site NES36.**

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**From** [REDACTED]  
**Date** Mon 2026-05-04 7:58 PM  
**To** SheffieldPlan <sheffieldplan@sheffield.gov.uk>

 1 attachment (499 KB)

Rebecca Nutton - objection - Main Modification site NES36.pdf;

External email

Dear Sheffield Plan

Please find attached my objection to the Main Modifications of site NES36.

Kind Regards

Bec Nutton  
[REDACTED]  
[REDACTED]

*Receiving this email outside of normal working hours? Managing work and life balance is unique for everyone. I have sent this email at a time that works for me. Please respond at a time that works for you.*

## **Objection to the Proposed Allocation of Site NES36 – Smithy Wood – in the Draft Sheffield Local Plan**

Further to my earlier objections to the proposed allocation and development of the Green Belt site NES36 (Smithy Wood) as outlined in the Sheffield Local Plan. I am now writing to submit my comments on the main modifications in respect of this site.

The main modification that has been made to this site is to remove the portion land which belongs to Mr S Keen, who never gave his authority to the developer for his land to be put forward for deletion from the Green Belt.

### **Site Plans**

Land originally put forward by developer:



Site area: Originally submitted as 40.27 acres

After Modification:



Site area: Reduced to 27.43 acres

(developable area significantly less – to be discussed later)

### **Fundamental Concerns**

The site has materially changed during the examination process. A significant area of land, which was included in the plan without the knowledge or consent of the landowner, has been removed, resulting in a smaller, more irregular and more constrained site.

The evidence base underpinning the allocation relates to a materially different site. No updated assessments have been undertaken to reflect the reduced and reconfigured site boundary. As a result, the Plan relies on evidence that is no longer applicable, rendering the allocation unsound.

The supporting evidence base was prepared on the basis of the original site boundary, now the boundary has changed the key assessments are out of date and unsound. This includes

biodiversity net gain, drainage, land contamination, transport, air quality, noise, landscape and heritage. These key assessments, vital to deciding the suitability of the site for any development, have been deferred to the planning application stage.

The Council's updated Green Belt assessment demonstrates that the remaining land performs more strongly against Green Belt purposes than the original site. This directly undermines the justification for its release.

In the original site assessment, NES36 was identified as having a number of significant constraints. These included major impacts on landscape, ecology, transport, air quality and contamination. The reduction in site size makes them more acute. There is now less space to accommodate mitigation, meaning impacts are pushed closer to sensitive receptors. A site that was already constrained has become more constrained.

### **Buffer Zones**

#### **1. Ancient Woodland**

NES36 directly adjoins Smithy Wood Ancient Woodland and forms part of the wider Blackburn Brook corridor. Development of the site would result in the effective severance of this connection.

MM350 continues to rely on a minimum buffer and a requirement to 'explore' ecological connectivity. This is inconsistent with the intent of GS7, which seeks to protect woodland through appropriate buffering. A 15 metre buffer is only for root protection to prevent direct damage, not a functional ecological buffer. It does not address air pollution, noise, lighting or disturbance, all of which are relevant in this location.

#### **2. Residential Housing**

The houses at 115 and 119 Jumble Lane directly adjoin this site. The Main Modifications fail to address the impact of this allocation on nearby residential properties. The revised site boundary is likely to bring development closer to existing receptors as there is much less developable area, yet there is no requirement within MM350 to assess or mitigate noise, traffic, lighting or general disturbance.

The Main Modification 459 for site CH03 introduces a clear zoning approach, requiring less intrusive employment uses to act as a buffer between large-scale warehousing and residential areas. This demonstrates that the Plan recognises the need to manage the impacts of employment land through separation and land use gradation. No equivalent approach has been applied to NES36, despite similar impact considerations.

Given the existing character of Smithy Wood Business Park, the site is likely to be used for logistics/warehousing; Smithy Wood Business Park already has many logistics sites and has recently had permission approved for a HGV refuelling station. Typical buffer expectations between logistics sites and residential housing would be an absolute minimum of 50-100m and then only when strong mitigation is in place (acoustic barriers, building shielding). Much larger buffer zones of 250m + would be expected where there is nighttime HGV use.

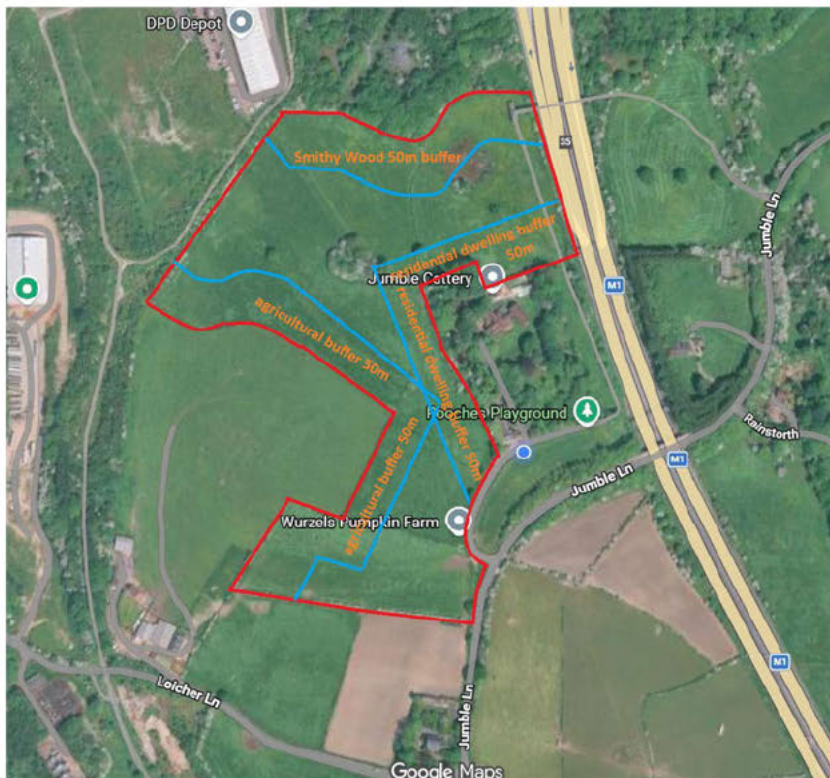
### 3. Neighbouring Agricultural Land

The Main Modifications fail to address the land use conflict introduced by the boundary change. The site now directly adjoins an active cattle breeding farm, which was not the case when originally assessed as it was assumed the whole of the farm would be included in the plan without the knowledge or consent of the land owner.

MM350 does not recognise this change or require any assessment of compatibility. The introduction of a large employment site, including HGV movements, lighting and continuous activity, is not compatible with livestock operations. A meaningful buffer would be required, a minimum of 50-100m would be expected, which has not been accounted for and would further reduce the developable area.

### **Reduced Developable Area**

If we take the buffer zones from the residential properties, animal breeding agricultural land and ancient woodland as a bare minimum of 50m, the developable land of site NES 36 now looks very different:



Applying minimum buffer distances of 50m to all sensitive boundaries would reduce the effective developable area to a fragmented and unviable form. Flexibility for access, drainage and layout are severely compromised.

### **Failure of Site Selection Due Diligence**

The Main Modifications still do not address the failure of the original site selection process, despite these being brought to the attention of planners, councillors and the inspectors at every

stage of this process. The site was promoted on the basis that the full land area was available, which is now known not to be the case.

Still there is only a vague agreement to co-operate from 2 of the 3 landowners of this site. This does not amount to any legally binding agreement to sell their land at all.

As a result, the site that was assessed and compared against alternatives is not the site that is now being allocated. The Main Modifications do not require this to be revisited, nor do they require the site to be reassessed against alternatives in its current form.

### **Overall Conclusion**

For the reasons set out above, the allocation of NES36 is not justified, not effective, and not consistent with national policy. The Plan is therefore unsound in respect of this site, and the allocation should be removed.

**REF5.0339**

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Site Ref SES13 - OBJECTION TO BUILDING PLANS EAST OF JAUNTY AVENUE

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From [REDACTED]

Date Mon 2026-05-04 8:39 PM

To [REDACTED]

External email

[REDACTED]  
Following on from a submission sent to you recently from our neighbours [REDACTED]  
[REDACTED] the content of which we agree with totally.

We would also like to add that we purchased our property [REDACTED] because it was on a quiet cul de sac and not overlooked by other houses [REDACTED]. Should new dwellings be built on the proposed site it would no doubt block out sunlight to our garden, interfere with our privacy and add more pollution to the area from the extra vehicles in and out of the cul de sac.

In all probability our house value could be dramatically reduced.

There are numerous established trees on the two tier proposed site which are important to the environment and these may well be lost in the process of your proposal.

I trust you will give our objections due consideration.

Regards  
John and Sue Warwick

**REF5.0340**

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**Subject: Objection to Main Modifications MM410 (SES29) and MM411 (SES30) — Sheffield Local Plan**

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From [REDACTED]  
Date Mon 2026-05-04 8:45 PM  
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

**Dear Sir / Madam,**

I am writing to formally object to Main Modifications MM410 and MM411. I consider both modifications to be unsound. My objection is based specifically on what the modification documents published for this consultation reveal — and what they fail to address.

**The modification text itself provides no site-specific justification**

The Schedule of Proposed Main Modifications states that MM410 is needed "to ensure the Plan has sufficient housing and employment land supply to meet the requirement set out in SP1," and MM411 uses identical wording for housing supply alone. That is the entirety of the justification offered in the modification text for releasing 91 hectares of Green Belt and inserting over 1,690 homes into the Plan.

This is a strategic supply justification, not a site-specific one. The NPPF requires that exceptional circumstances be demonstrated for each individual site. The modification documents do not contain this evidence. A modification that simply states it is needed to meet a housing number, without showing why these particular sites in this particular location are the appropriate response, cannot be considered properly justified.

**The HRA Appropriate Assessment Update (2026) acknowledges the modifications increase environmental harm**

The Habitats Regulations Appropriate Assessment Update, produced by Cura Terrae on behalf of Sheffield City Council specifically for this consultation and dated February 2026, is one of the five documents the Inspectors are inviting comment on. It is therefore directly relevant to whether the modifications are sound.

That document states at paragraph 6.4.1 that the modifications increase housing capacity by approximately 0.8% compared to what was previously assessed, and that as a result "there will be a slight increase in the potential for recreational pressure on the European Sites." This is the Council's own new assessment, produced for this consultation, acknowledging that the modifications worsen environmental outcomes.

The document then relies, at paragraph 6.4.2, on "outline mitigation measures" and a "commitment to develop a full mitigation strategy in consultation with Natural England and PDNPA" to justify a conclusion of no adverse effect. These are future commitments, not secured measures. Mitigation that is outlined rather than confirmed cannot form the basis for a robust finding that these modifications are sound.

## **The HRA Update determines no new traffic modelling is needed — but on inadequate grounds**

Paragraph 6.2.2 of the HRA Update states that no additional traffic modelling would be necessary to assess the Main Modifications, because the gap between the previously modelled traffic increases and the threshold for further assessment remains sufficient. But the modifications explicitly increase the scale of development — more homes and significantly more employment land than the model previously assessed. Determining that no new modelling is needed when the quantum of development has increased is not a finding the evidence supports. I live in S13 and travel through it daily. Roads are regularly at a standstill between 7:30 and 10:30 and again between 16:00 and 19:00. The assertion that additional modelling is unnecessary is not credible from the perspective of someone experiencing the current baseline.

## **The modifications to SES29 and SES30 are minimal and do not address known problems**

The HRA Update at paragraph 6.3.2 sets out what the modifications actually do to individual sites. For SES29, the modification "amend[s] site area to exclude small areas of unavailable land" — and explicitly states "site capacity is not affected." For SES30, there is "a small section not available for development and reduction to 827 home capacity." These are boundary tweaks, not substantive responses to the evidence of constraints on these sites.

This is directly comparable to what happened at other sites. NES39, for example, saw "removal of Parcels B and C from the allocation and a reduction to 66 home capacity" — a genuinely substantive modification in response to evidence of problems. The contrast is stark. Where evidence supported reduction, other sites were materially changed. SES29 and SES30 received only minor boundary adjustments despite documented issues with contamination, coal mining risk, air quality, access, and ecological value. The modifications do not demonstrate that these issues have been resolved or even properly addressed.

## **The IIA Addendum acknowledges the assessment was incomplete before the modifications were proposed**

The April 2025 Integrated Impact Assessment Update acknowledged in its own text that "there will also be a need to update the whole plan appraisal to take account of Modifications, which is likely to change the findings in relation to several SA topics." This is now the IIA Addendum produced for this consultation. Planning consultant James Bailey has confirmed that the IIA options assessed do not correspond to the housing numbers now proposed, meaning the consequential impacts of additional homes have not been properly accounted for. A modification cannot be considered sound if the sustainability assessment underpinning it was, by its own prior admission, incomplete, and if the options tested do not reflect what is now being proposed.

## **The modifications contain no remedy for healthcare infrastructure**

The J Bailey Planning report submitted to the examination noted at paragraph 2.14 that there are "no details of agreements in place with the local NHS/Integrated Care Board" despite the substantial growth planned in the S13 area. The modifications documents do not address this. MM410 and MM411 add over 1,690 homes to S13 with no confirmed healthcare provision. I have experienced this directly: I was unable to register with an NHS dentist when I moved to the area — every practice was full — and I was forced to go private. I regularly cannot get a same-day GP appointment. The modifications offer no evidence that this will be different for the thousands of new residents these sites would bring.

## **Conclusion**

MM410 and MM411 are unsound. The modification text provides no site-specific exceptional circumstances. The Council's own HRA Update, produced for this consultation, acknowledges the modifications increase pressure on protected European Sites while relying on outline and future mitigation. The traffic modelling determination is made without new data despite an increased quantum of development. The site-specific modifications to SES29 and SES30 are minimal and do not address documented constraints. The IIA was by its own admission incomplete before the modifications were proposed. And there remains no confirmed plan for healthcare infrastructure.

I request that MM410 and MM411 are not confirmed, and that SES29 and SES30 remain Green Belt.

Roxanne Myles

**REF5.0341**

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

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From [REDACTED]  
Date Mon 2026-05-04 8:46 PM  
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

[REDACTED]  
Dear Council,

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

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

**A. Failure to Comply with the Environmental Assessment Regulations**

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

- The Council has not demonstrated that brownfield alternatives were fully assessed before allocating greenfield land in S13.

- The Integrated Impact Assessment (IIA) or Habitats Regulations Assessment (HRA) does not specifically evaluate the S13 site, this is a procedural failure.

Inspectors must ensure the plan complies with these regulations.

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

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

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

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

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

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

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

## **2. Soundness Arguments (required by the NPPF)**

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

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

None of the tests of soundness have been met.

### **A. Not Positively Prepared**

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

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

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

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

### **C. Not Effective (Cannot Be Delivered)**

The site has constraints.

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

identified.

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

#### **D. Not Consistent with National Policy**

The NPPF contains strong protections for:

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

These all apply to the S13 site.

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

### **3. Site-Specific Characteristics - Legal Arguments**

#### **A. Biodiversity and Wildlife Law**

The site contains protected species and habitats:

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

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

The land will have flood and surface water issues:

- The Council must apply the Sequential Test and Exception Test.

- The allocation is unsound and unlawful otherwise.

### **C. Loss of Open Space (NPPF para 99)**

The NPPF states:

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

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

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

### **4. Procedural Argument: The law is clear:**

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

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

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

I look forward to your response.

Nicola Bates

S13 resident

**REF5.0342**

**Representation on main modifications mm410 and mm411**

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**From** [REDACTED]  
**Date** Mon 2026-05-04 9:03 PM  
**To** SheffieldPlan <sheffieldplan@sheffield.gov.uk>

 1 attachment (21 KB)

Emma Siddall Objection MM410 MM411.docx;

External email

Hi please find attached my objection letter.  
Yours sincerely  
Emma Siddall

Sent from Outlook for Android

Emma Siddall

5 May 2026

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

## **FORMAL REPRESENTATION — SHEFFIELD LOCAL PLAN MAIN MODIFICATIONS CONSULTATION**

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**Modification References:** MM410 (SES29) and MM411 (SES30)

**Sites:** SES29 — Handsworth Hall Farm, Finchwell Road | SES30 — Land between Bramley Lane and Beaver Hill Road

**Nature of Representation:** Objection — Both modifications are unsound and should be removed from the Plan

**Representor:** Emma Siddall, [REDACTED]

### **About Me and My Family**

My name is Emma Siddall and I live on [REDACTED]. I am writing this objection as a resident of S13 and as a mother, because I believe the people making decisions about this plan need to understand what life is actually like for families in this area — and what will be lost if these allocations go ahead.

I do not drive. I rely entirely on walking to get around — to school, to the GP, to see my family, and to give myself and my children the fresh air and outdoor space that is essential to our wellbeing. The green fields in S13, including those proposed for development under SES29 and SES30, are not abstract open space. They are a lifeline for our family.

[REDACTED]

[REDACTED]

## **The School Run — A Daily Danger That Development Will Make Worse**

This already causes a serious problem. The roads around [redacted] at school collection time are heavily congested with parked cars, moving traffic, and other parents. The pavements are blocked. There is nowhere safe for [redacted] to stop. I am unable to use the paths near the school entrance at that time because the pavement is inaccessible due to parking and the volume of people. [redacted]

SES29 and SES30 together would bring approximately 1,697 new homes to an area immediately surrounding this school. That is thousands more residents, thousands more cars, and a vastly greater volume of traffic through the roads around Ballifield at school times. I am asking the Inspectors to consider what that means in practice for a family like mine — a non-driving mother trying to safely collect a [redacted] in already dangerous conditions. This situation will become significantly worse, not better, with the scale of development proposed.

## **The Green Fields Are Not Spare Land — They Are Our Lifeline**

I do not drive, so I walk everywhere. The green fields and open paths of S13 — including the fields proposed for development under SES30, which I reach via Grange Lane — are the route I use regularly to walk to my [redacted]. That walk, across open land, is one of the few ways I can spend time with them without relying on anyone else. It is part of my independence and part of my family life.

These fields are also where I go when things are hard. Anyone caring for a child with a [redacted] will understand what I mean when I say that you need somewhere to breathe. The open space in S13 — the fields, the air, the quiet — is that place for me. It is where I go to clear my head, to process what we are going through as a family, to simply exist outside the four walls of a home that is full of equipment, appointments, and worry.

The Council's own Integrated Impact Assessment acknowledges that the loss of this Green Belt will have negative effects on mental health and wellbeing. It says this in a single sentence and then offers nothing further — no plan, no mitigation, no alternative. For someone in my situation, that is not good enough. The research on this is clear: access to green space supports mental health, reduces stress, and is especially important for carers

and families living with chronic illness and disability. Removing it without any plan to replace it or mitigate the harm is not sound planning. It is an admission of harm with no remedy.

## Healthcare — Already Overwhelmed, No Plan for What Comes Next

A Freedom of Information request submitted to the NHS confirmed that GP surgeries in the S13 area — including Handsworth Medical Practice — are already at or beyond capacity. There is no confirmed, funded plan for how these services will cope with the additional population that would result from the SES29 and SES30 allocations. The Council's position is that the existing surgeries could be physically expanded, funded by developers. This is not a plan. It is a hope.

Handsworth Medical Practice operates from two sites — Handsworth Road and a branch on Fitzalan Road — with a team of five doctors serving the Handsworth, Woodhouse, Richmond, Stradbroke, and Darnall areas. Anyone who has tried to get an appointment recently will know that the service is already stretched beyond what it can manage. Anyone who has tried to ring at 8am and been number 34 in the queue will know. The idea that adding thousands of new residents to this catchment area, while simply adding a few rooms to the existing buildings, will resolve this problem is not credible.

For families like mine — [REDACTED] — the functioning of local primary care is not an abstract concern. It is a practical reality that affects us every week. A deterioration in GP access caused by underfunded and under-planned housing development is a direct harm to my family's ability to manage [REDACTED]. The plan makes no adequate provision for this.

## The Cumulative Impact on S13 Is Not Fair

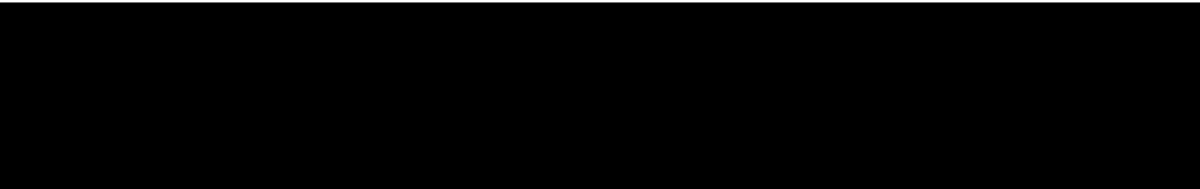
I want to be honest. I understand that Sheffield needs new housing. I am not opposed to houses being built. What I am opposed to is the way this plan places an extraordinary and disproportionate share of that burden on a single community that already has very little green space to lose.

The two S13 sites together account for 43.4% of all the homes proposed on Green Belt across the entire city of Sheffield. S13 would lose over 90 hectares of green farmland — more than half of all the farmland the plan proposes to sacrifice city-wide. The three communities of Handsworth, Woodhouse, and Stradbroke would effectively be merged into a continuous urban sprawl connecting Sheffield to Rotherham, while more affluent areas of the city with access to the Peak District are largely left untouched.

This is not a fair or proportionate distribution. And for residents like me — who are already stretched, who do not drive, who rely on green space for health and walking routes, and [REDACTED] — this concentration of development in one postcode is not just a planning matter. It is something that will directly shape the quality of life available to our family for years to come.

## Conclusion

I am asking the Inspectors to read this letter not as a set of technical planning arguments, but as an account of what these allocations mean to a real family living in S13.



The Council's own evidence acknowledges the harm to health and wellbeing. A Freedom of Information request has confirmed that GP services are already at capacity with no funded solution. And the scale of development being imposed on a single community is, by any objective measure, disproportionate and unfair.

I formally request that the Inspectors:

- Decline to recommend MM410 and MM411 as sound and lawful Main Modifications;
- Require sites SES29 and SES30 to be removed from the Sheffield Local Plan; and
- Direct that both sites be retained within the Green Belt and protected from development.

Thank you for reading this. I hope you will take it seriously.

Yours faithfully,

**Emma Siddall**



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## Sources and References



### Sheffield Local Plan and S13

- Sheffield City Council, Schedule of Main Modifications (2026) — MM410 (SES29) and MM411 (SES30)
- Sheffield City Council, IIA Update and Addendum (2026) — acknowledges negative effects on mental health and wellbeing from Green Belt loss

- Save S13 Green Belt farmland data: 43.4% of city's Green Belt housing in S13; 90+ hectares farmland lost. [saves13greenbelt.org.uk/kier-starmer-farmland](https://saves13greenbelt.org.uk/kier-starmer-farmland)

### **Healthcare**

- Freedom of Information request to NHS South Yorkshire ICB re: GP capacity in S13 (2025–2026) — confirms surgeries at or beyond capacity; no confirmed funded expansion plan
- CQC inspection record — Handsworth Medical Practice: 5-doctor practice serving Handsworth, Woodhouse, Richmond, Stradbroke and Damall from two sites. [cqc.org.uk/location/1-542702937](https://cqc.org.uk/location/1-542702937)

### **Mental Health and Green Space**

- Sheffield City Council, IIA Report Addendum: Modifications Consultation (2026) — acknowledges negative effects on health and wellbeing from loss of Green Belt land
- NHS: 'Green spaces and mental health' — evidence that access to green space reduces stress and supports mental wellbeing, particularly for carers and those with chronic health conditions

**REF5.0343**

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

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From [REDACTED]  
Date Mon 2026-05-04 9:04 PM  
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Strategic Planning Team,

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

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

I therefore set out below my objections to specific modifications.

**MM7-** This reframes the purpose of the Green Belt by highlighting only its role in supporting urban regeneration, while omitting the full set of Green Belt purposes set out in the NPPF. This narrow and reductive wording misrepresents national policy, weakens the strategic function of the Green Belt, and risks distorting future decision-making by implying that regeneration is its primary or sole purpose. Sheffield's Green Belt prevents sprawl and safeguards the countryside, yet MM7's selective emphasis creates an imbalanced narrative that could be used to justify further releases. The modification is therefore not justified, not effective, and should be amended to reflect the complete statutory purposes of the Green Belt. There is the further issue of NEDDC 45900, the development of SS19, NEDDC 45900 or both will blur these lines and in fact create urban sprawl across two counties.

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) and 119 applicants for the 60 places in 2026. The next nearest local primary schools Woodlands and Gleadless are over capacity and there are only 58 secondary places available across all S12 secondary providers, the lack of planning and commitment is unacceptable as it is young people who will be severely impacted. This fails our young people catastrophically. 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. If this was development in one place there would be a requirement to provide a concrete commitment to infrastructure such as buses, schools, GP surgeries.

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 such as the 8 and 252, are infrequent and unreliable (252 does not run into the evenings or Sunday's leaving White Lane and High Lane completely reliant on private car transport methods). 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,

**Charlotte Corker**



Sent from [Outlook](#)

**REF5.0344**

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## Representation on Main Modifications MM410 & MM411

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From [REDACTED]  
Date Mon 2026-05-04 9:10 PM  
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Sir/Madam,

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

My objection is specifically that these Main Modifications are unsound, as they fail the tests of being justified, effective, and consistent with national policy due to the absence of a clear and deliverable infrastructure plan—particularly in relation to healthcare provision.

There is no credible or evidenced plan demonstrating how existing local services will cope with the additional demand arising from these developments.

In my direct experience, local GP services are already under severe strain. It is extremely difficult to even get through to a receptionist, with waits of around 30 minutes at peak times, by which point all appointments are gone. This clearly indicates there is no existing capacity to absorb further population growth.

More broadly, local infrastructure in the Handsworth area is already under significant pressure. GP surgeries, schools, and dental services are oversubscribed. Accessing a dentist is effectively impossible unless it is an emergency. These are not minor issues—they demonstrate a system already operating beyond capacity.

Traffic and transport impacts are also not adequately addressed. I live on the Ballifield estate, close to a main route through Handsworth, where congestion is already significant, particularly during peak and school times. The situation has worsened with recent developments such as the LIDL supermarket and local roads are increasingly used as rat runs, with frequent speeding. The submitted transport assessments are incomplete and do not properly reflect the real-world impacts on local roads and safety.

In addition, the Council's own assessment indicates that the modified plan performs worse in environmental terms, including impacts on land, biodiversity, and transport.

This raises serious concerns about the justification for releasing Green Belt land in these locations.

There is also inconsistency in the treatment of sites within the plan. Other sites have been removed due to a lack of deliverability or insufficient evidence, yet these Green Belt sites are being advanced without the same level of robust supporting evidence.

Crucially, too many important details—particularly around infrastructure provision—are being deferred to later stages. This means the plan is not properly worked through and cannot be considered deliverable.

For these reasons, I consider Main Modifications MM410 (SES29) and MM411 (SES30) to be unsound. I respectfully request that these site allocations are removed from the Local Plan and that the land remains designated as Green Belt.

I urge you to recognise the clear concerns of local residents who understand the existing pressures and

limitations of this area.

Yours faithfully,

Terri McAlpine

**REF5.0345**

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**Modification references: MM411 (Site SES30) & MM410 (Site SES29)**

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**From** [REDACTED]  
**Date** Mon 2026-05-04 9:13 PM  
**To** SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

[REDACTED]

Dear council,

I have lived in the local areas of Handsworth and Stradbroke for a total of 53 years and writing to put forward my objection to the Main Modification to the Sheffield local plan. References MM411 (Site SES30) and MM410 (Site SES29).

Having lived in this area all my life this wouldnt be the first time this area has undergone a significant reduction in its green space, having succumb to the opening of the Mosborough parkway in the early 1990s, carving its way through farmers fields and the habitat of the local wildlife. The increase in traffic this brought to the local areas was huge at the time and has since grown, reducing air quality in the area. This would become an even greater issue with the introduction of 827 new houses around the Bramley estate of Handsworth, further reducing the air quality and increasing an already overly congested local road network.

I feel that the less salubrious areas of South East Sheffield appear to be the easy option for our council to introduce so many new homes over the wealthier side of Sheffield where most of our councillors reside, areas that rarely appear to see any such changes if ever at all. I would in this case query where the justification is in taking 90 percent of our greenbelt rather than sharing the distribution more fairly across the city. This would ensure that there isn't an even greater divide in health equality, green space access and a safe places for our local wildlife to thrive.

I consider the above referenced modifications to be unjust and unfairly distributed throughout the Sheffield area and would like the plans to be revoked to prevent further depletion of our local green space.

Please provide me with an update by email to any decisions that are made regarding my request.

Yours sincerely  
Glen Charlesworth

**REF5.0346**

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

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From [REDACTED]  
Date Mon 2026-05-04 9:21 PM  
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

[REDACTED]  
[Dear Strategic Planning Team,](#)

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

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

I therefore set out below my objections to specific modifications.

**MM7-** This reframes the purpose of the Green Belt by highlighting only its role in supporting urban regeneration, while omitting the full set of Green Belt purposes set out in the NPPF. This narrow and reductive wording misrepresents national policy, weakens the strategic function of the Green Belt, and risks distorting future decision-making by implying that regeneration is its primary or sole purpose. Sheffield's Green Belt prevents sprawl and safeguards the countryside, yet MM7's selective emphasis creates an imbalanced narrative that could be used to justify further releases. The modification is

therefore not justified, not effective, and should be amended to reflect the complete statutory purposes of the Green Belt.

Further to this, paragraph 5.9.8 of the Impact Assessment Report Addendum: Modifications Consultation (referred to in this document as IIA from this point, which can be found [here](#)) confirms that 'permanent negative effects would remain' on the environment and landscape character of SS19 as a result of its development. The assessment also confirms in paragraph 5.9.12 that the moderation of allocating green belt sites for development will have predominantly negative effects that will be difficult to fully mitigate. **MM10 MM11 MM90-MM93** - The Sheffield Local Plan relies on a significant windfall allowance of 7,475 homes out of a total supply of 39,159 homes (MM90), equating to approximately 19% of the overall housing supply.

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

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

**MM18-** With SS19 being one of the first green belt sites to be developed, and a year 7 place deficit until 2028/29, this does not provide the assurance that there will be adequate educational provision in the S12 area. Paragraph 3.2.3 of the Integrated Impact Assessment Report Addendum: Modifications Consultation (document [here](#))

states that, if a city centre school was built, it would be unlikely to be ready in time for the forecast peak deficit in places, weakening this mitigation further still. The moderation also fails to address how the educational needs of a post 16 student population, which continues to rise and will peak in 2028/29, will be met. This is a particular concern for S12 as the population will increase significantly with the planned development and south-east Sheffield has no post-16 provision. There are also significant concerns about primary school provision across the S12 area, with Charnock Primary Academy (the primary school closest to SS19) already being oversubscribed by 33% (Sheffield City Council, 2025).

The plan proposes the development of approximately 1,600 new homes in this part of the city (Draft Sheffield Local Plan Interactive Map and Sheffield Additional Site Allocations), growth that would ordinarily require a new primary school if delivered as a single strategic development. However the plan fails to demonstrate that essential education infrastructure can support the proposed level of growth. MM19- The wording “include consideration” is non-binding and fails to secure delivery.

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

Concerns around the impact of development on health and wellbeing are supported by

the revised IIA (which can be found [here](#)) which states that ‘some new site allocations may reduce the overall amenity experienced by nearby residents.

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

**MM20** -The phrase “wherever practicable” is unacceptably ambiguous in a policy area that is critical to sustainable development and infrastructure delivery. It provides no commitment or assurance that transport improvements will be secured. The modification fails the NPPF tests of effectiveness and clarity, and risks undermining modal shift, accessibility, and safety objectives. It also weakens the plan’s ability to secure equitable outcomes across sub-areas. The wording must be replaced with a firm commitment to secure transport improvements proportionate to development scale and impact, supported by planning obligations and the Infrastructure Delivery Plan. This is particularly important for the S12 area, where transport is a significant concern in relation to the scale of development proposed.

The Sheffield Local Plan identifies approximately 1,600 new homes across S12, which will inevitably generate a substantial increase in traffic movements and place additional pressure on an already constrained local road network. However, due to the dispersed spatial distribution of these allocations, there is currently no clear or coordinated transport strategy demonstrating how the cumulative impact of these developments will be mitigated. The plan does not provide sufficient detail regarding required junction improvements, public transport capacity, pedestrian and cycling infrastructure, or wider highway mitigation measures necessary to support this level of growth. Without clear and deliverable transport commitments, there is a risk that the cumulative traffic impacts will significantly worsen congestion, reduce road safety, and

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

**MM127 & MM128-** The Plan suggests that Green Belt windfall sites could deliver up to 50% affordable housing, but there is no evidence this is achievable in practice. In fact, the Council's own evidence shows that sites like SS19 are only likely to deliver around 30% affordable housing. This creates a clear gap between what the policy promises and what can actually be delivered. The Plan also relies on "windfall" sites to deliver higher levels of affordable housing. However, windfall sites are uncertain and cannot be guaranteed to come forward, or to deliver the infrastructure and affordable housing needed.

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

**MM224 MM 227-** These modifications recognise that some sites have constraints (such as flood risk, access issues, and environmental limits), but there is no evidence of any

level of recalculation to ascertain the reduction in buildable area and therefore reduction of the number of homes expected from those sites.

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

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

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

**MM429 (SS19)** - The S12 Green Belt Action Group has submitted two previous consultation statements for MM429 (SS19) which highlight significant site constraints including flood risk and the ecological corridor, the need to protect the robin brook and its impact on the Moss Valley SSSI along with access constraints and hedgerow buffers but SS19 is not referenced in MM224 or MM227, which should require recalculation of housing impact across site allocations. This omission is concerning. If SS19's constraints are serious enough to warrant modification text, they should also trigger a reassessment of its contribution to housing supply. The failure to cross-reference SS19 in the impact recalculation undermines the credibility of the housing trajectory and suggests that constraint-driven reductions are not being applied consistently. This raises

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

It is also apparent that even with amended brook buffers and hedgerow buffers, the appropriate buffering has not been removed from the developable area, it is believed this will have an impact on the number of houses that are deliverable on the site and therefore impact the viability of the site. The modifications also fail to consider the impact of North East Derbyshire District Council's Local Plan, particularly its proposed allocation immediately adjacent to SS19 (site reference 45900), which could deliver a further 348 homes alongside shops or a care facility. It is significant that the landowner, promoter and developer for site 45900 are the same as for SS19, yet NEDDC has assessed 45900 as unsuitable for development due to the same constraints repeatedly raised in relation to SS19. The development of 45900 would create a single, continuous cross-boundary block of development that would clearly conflict with several of the Green Belt purposes set out in national policy: they would **fail to check the unrestricted sprawl** of the existing built-up area, **erode the separation between Sheffield and North East Derbyshire**, and **constitute significant countryside encroachment**. The two developments would effectively double the size of the Charnock estate with no planned proportionate infrastructure to support this rapid growth. There appears to have been no meaningful collaboration with Sheffield City Council to assess the combined effects of these neighbouring proposals. The absence of any cross-boundary assessment represents a clear gap in the evidence base and undermines the justification for retaining SS19 in the plan.

This raises serious concerns regarding compliance with the Duty to Cooperate and

further undermines the soundness of the Plan.

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

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

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

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

Yours sincerely,  
Ammarah Hassanjee

**REF5.0347**

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

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From [REDACTED]  
Date Mon 2026-05-04 9:27 PM  
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Strategic Planning Team,

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

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

I therefore set out below my objections to specific modifications.

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

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

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

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

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

The plan proposes the development of approximately 1,600 new homes in this part of the city (Draft Sheffield Local Plan Interactive Map and Sheffield Additional Site Allocations), growth that would ordinarily require a new primary school if delivered as a single strategic development. However the plan fails to demonstrate that essential education infrastructure can support the proposed level of growth. MM19- The wording “include consideration” is non-binding and fails to secure delivery.

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.

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The Sheffield Local Plan identifies approximately 1,600 new homes across S12, which will inevitably generate a substantial increase in traffic movements and place additional pressure on an already

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

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

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

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

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

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

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

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

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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,  
Timothy Goddard




**REF5.0348**

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**Sheffield Plan - Consultation on Main Modifications**

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**From** [REDACTED]  
**Date** Mon 2026-05-04 9:58 PM  
**To** SheffieldPlan <sheffieldplan@sheffield.gov.uk>

 1 attachment (1,014 KB)  
Sheffield Plan Consultation Representation.pdf;

External email

Hi,

Please find attached, my personal representation on the Main Modifications to the Sheffield Plan for the attention of the Government Inspectors.

Kind Regards,

Julie Harris

## Sheffield Plan-Consultation on Main Modifications

To: Strategic Planning

5<sup>th</sup> Floor, Howden House,

Sheffield, S1 2SH

Email: [sheffieldplan@sheffield.gov.uk](mailto:sheffieldplan@sheffield.gov.uk)

Dear Planning Inspector,

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

### **Introduction**

Many factors affect the viability and deliverability of site NWS31 including, flood risk, site access and local highway issues, yet few of these issues have undergone detailed assessment. Development of the site would also, undoubtedly 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.

For some local residents, particularly some of those with Protected Characteristics, the negative impacts of development (both during construction and after) would be devastating, almost unbearable and in a few cases, even life-changing.

The proposed development site is in the heart of our small village, well used for recreation and highly valued by the local community. It is also teeming with wildlife including protected species. As this would be a comparatively small development and likely to be expensive due to site constraints, the negative effects of development are likely to significantly outweigh any positive benefits to this community. In addition, the council's current plans for mitigations and compensation for this particular site are minimal and not likely to be effective, if indeed feasible at all.

**The Main Modifications to the Plan rely on mitigations and compensatory measures yet do not provide certainty that these can be delivered or that they will address the needs of existing residents. On this basis, the MM's are not 'sound'.**

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.

In order to be 'sound', Main Modifications (MMs) to the Plan need to 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 near 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 Green Belt 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 (almost 5,000 less in 2 years). These will both have an impact on the amount and also type of building required in this city.

**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 *IJA update and addendum* and its findings on sustainability, reassessment of a Brownfield only option is likely justified.

**The Plan should therefore be paused 'in view of new evidence' and housing requirement projections re-calculated, in addition to a new call for Brownfield sites. There should then be an assessment of whether 'Exceptional Circumstances' still exist.**

If this does not happen, there is a risk that developers will snap up the Green Belt sites in favour of inner city Brownfield sites, in much need of redevelopment, and we could end up with large empty family homes on the outskirts of the city, and in the process, lose more of our Green Spaces.

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

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

The Council acknowledges that:

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

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

They also say that:

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

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

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

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

**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 SAS, 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. 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."

Yours sincerely,

Julie Harris



**REF5.0349**

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

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**From** [REDACTED]  
**Date** Mon 2026-05-04 10:02 PM  
**To** SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Strategic Planning Team,

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

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

I therefore set out below my objections to specific modifications.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

MM224, MM227 – These modifications recognise that some sites have constraints (such as flood risk, access issues, and environmental limits), but there is no evidence of any level of recalculation to ascertain the reduction in buildable area and, therefore, reduction of the number of homes expected from those sites.

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

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

More worryingly, SS19 is not included in these modifications, even with significant constraints, including flood risk and the ecological corridor, as well as additional buffers for the brook and hedgerows. This creates a risk that the Plan is relying on housing numbers that are not realistic, which undermines confidence that the overall housing target can be

met. With such a low “buffer” of housing above the target, the plan could fail should the reality be reflected.

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

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

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

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

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

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

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

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

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

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

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


Yours sincerely,  
Mr Luke Eccleston


**REF5.0350**

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**Comments and representation on main modifications for local plan**

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**From**   
**Date** Mon 2026-05-04 10:09 PM  
**To** SheffieldPlan <sheffieldplan@sheffield.gov.uk>

 1 attachment (23 KB)  
my letter for main modifications.docx;

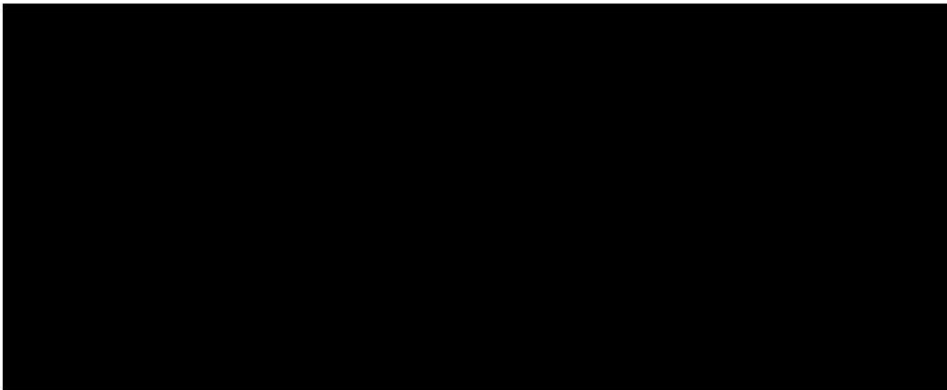
External email

Hello,

Please find attached my representation/letter for consideration, commenting on the modifications of the local plan regarding site CH03 between Warren lane and the M1.

Regards

**Liam Cross**



## **Representation to Sheffield Local Plan Main Modifications – Objection to MM459 (Site CH03)**

**Site Reference:** CH03

**Location:** Land bordered by M1, Thorncliffe Road, Warren Lane and White Lane, S35

This is my formal objection to the Main Modification MM459 relating to the allocation of Site CH03 as a General Employment Area.

Although my objection specifically relates to the above mentioned site allocation, CH03 cannot be assessed in isolation as it forms a cluster of allocations with CH04, CH05, NES36, NES37, NES38 & NES39. These proposed Greenbelt sites create a significant outward expansion of the settlement boundary and result in a continuous tract of Greenbelt loss.

Whilst I recognise the need for Sheffield to grow and develop, the requirement to develop site CH03 into employment land is not clearly justified in terms of local unemployment and demand for this type of premises.

There is a surplus of unused and available B2 and B8 premises in the local area that are empty and have been for some time, outlining that the demand for this kind of development is low and not needed in the current climate. The neighbouring industrial estates/business parks including Thornecliffe business park, 35A business park and the Winston business park (all within 0.5 miles of Warren lane) have multiple office and, industrial and warehouse accommodation (up to 7,129 Sq ft) empty and available to let. Smithywood business park currently has 6 vacant employment sites that are also available re-enforcing that this area is saturated and the removal of further greenbelt land for this type of development simply cannot be justified.

I consider, the proposed modifications still render the allocation of site CH03 unsound when assessed against the tests of soundness set out in the National Planning Policy Framework—namely that the plan must be justified, effective, and consistent with national policy.

### **Impact on Residential Amenity**

The site is in close proximity to existing residential properties, particularly along Warren Lane where it borders the rear of the local residents properties. Although the modification introduces a “zonal approach” and requires buffering through Class E(g)(iii) uses and landscape buffers, this is unlikely to adequately mitigate the impacts of B2 (general industrial) and B8 (storage and distribution) uses which are often tall, multistorey buildings that will tower over the adjacent area.

The site consists of rising ground and it overlooks existing residential properties, because of the elevated nature of the ground it is difficult to see how the industrial development could be effectively screened from view without complete flattening of the site and the excavation of 1000's of tons of possibly contaminated land. Even if this was achieved, a development of more than 1 storey would not be screened from the residents or shield the residents from the employers being able to see into their homes.

In the construction stage the air contamination and dust that would arise from such a large development would pose a substantial risk to the resident's health and there is no clear mention of how this will be addressed in the local plan or its modifications. Are the residents simply just unable to use their garden whilst the premises is being built to avoid inhalation of toxic substances and dust? Simply, saying it needs to be addressed at planning application stage is not acceptable when there are significant risks for long term health problems.

Once up and operational the impact of class B2 and B8 employment premises in such close proximity has also not been satisfactorily addressed. I do not believe a small buffer zone will satisfactorily shield the rear facing bedrooms on Warren lane from the adjacent light and noise pollution that will be operational 24 hours a day. We already suffer from noise and pollution from the adjacent M1, and light pollution from the nearby EVRI centre in Hoyland and the adjacent Thorncliffe industrial estate. Any further pollution to the local residents will be extremely detrimental to their physical and mental well-being.

The reliance on layout-based mitigation at the planning application stage introduces uncertainty, and does not provide sufficient assurance that unacceptable impacts on residential amenity can be avoided. The allocation is therefore not justified in this location.

### **Highway and Transport Impacts:**

The modification confirms that access will be required from Thorncliffe Road and that contributions may be needed for wider network improvements. However, there is insufficient evidence at this stage to demonstrate that the local and strategic highway network can accommodate the scale and type of traffic likely to be generated by a 17.26-hectare employment site, particularly for B8 uses which are associated with high levels of HGV movements.

Access to the site entrance will be gained via the M1, Stocksbridge bypass, Warren lane or by coming up Thorncliffe road from the old cart road.

This segment of the M1 and the neighbouring junctions is an accident hotspot and frequently sees closures due to incidents. This often impacts traffic through Chapeltown and Warren lane as drivers are diverted from the Motorway. The local transport network is unable to cope with additional commuter and HGV transport.

Stocksbridge bypass is often tail backed with traffic in both directions and traffic through Chapeltown is always heavy at rush hour. In view of this, Warren lane is often used as a rat-run for faster access to the M1 and in rush hour can be dangerous as people do not abide the speed limit (20mph) as they are using the road to save time. The road itself is hazardous with parked cars either side and a blind bend in the middle. There is no doubt that the addition of such a large employment premises and the associated employees commuting to the site will not be sustainable on the local roads.

The use of public transport is also unlikely due to the restrictions on local availability as it is limited and unreliable.

Service 35 makes 12 journeys between approx. 06.00 and 18.00, but only 3 on Saturdays the nearest bus stop for this is approx. 200 metres distant, with no foot path.

Service 201 this makes approx. 10 journeys per day at irregular intervals between approx. 07.00 and 18.00 Monday to Saturday, the nearest bus stop is over 500 metres distant down quite a hill, with no foot path for half that distance, in bound services are frequently delayed due to traffic queues on the A616.

Service 2/2a these services run past the east end of Warren Lane, at approximately hourly intervals from about 05.30 to 22.00 approx 20 services in total, less at weekends.

The railway station is about 2km distant in the valley. From the above it will be seen that public transport is not a convenient option.

Without firm, deliverable mitigation measures identified, the allocation is not effective and may result in severe residual cumulative impacts on the transport network, contrary to national policy.

### **3. Loss of Green Belt and Inadequate Compensation**

The site has been released from the Green Belt, yet the proposed compensatory improvements are not clearly defined or secured. The requirement to deliver improvements identified in a separate document lacks certainty and enforceability.

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

The environmental and amenity value of the existing Green Belt land—particularly in preventing urban sprawl and safeguarding the setting of nearby communities—cannot be adequately replaced through off-site or unspecified measures.

This site supports a variety of wild life such as skylarks, kestrels, shrikes, magpies and owls among the bird life, and bats, badgers, small deer etc. amongst mammals ( We occasionally get bats in the house, which I have to catch and liberate). It is difficult to see how the CH03

proposal can maintain the current levels of biodiversity. Wild life corridors will be of little help, when one considers the arc of other proposed developments alongside the M1.

The Chapeltown, Ecclesfield and Grenoside (CEG) group have identified brownfield sites whose combined area (200+ hectares) exceeds that of the proposed greenbelt land, and the council's brownfield first policy should ensure this is ALL utilised before removing the land from the greenbelt for development. There is no proof of exceptional need to develop this site and this is especially important when considered in conjunction with the Hesley Wood and Smithy Wood developments as the devastating loss of greenbelt land and the destruction of the local wildlife and ecosystem over such a small area cannot be justified. No compensation in the local areas can replace this established wildlife.

The allocation is therefore not justified.

#### **4. Environmental Constraints and Deliverability**

The site is subject to a wide range of constraints, including:

- Flood risk (as identified in the Level 2 Strategic Flood Risk Assessment)
- Presence of Northern Powergrid infrastructure
- The Tankersley railway tunnel running beneath the site
- Potential land contamination and proximity to a historic landfill
- Ecological and biodiversity requirements
- Archaeological interest

Taken together, these constraints and the modification to remove the triangle of land adjacent to the old peoples home significantly reduces the net developable area to approx. 11 hectares and introduces uncertainty regarding the viability and deliverability of the site.

The plan does not demonstrate that development can be viably delivered within the plan period, meaning the allocation is not effective.

#### **5. Over-Concentration of Industrial Uses Near Existing Communities**

The allocation represents an intensification of industrial activity in close proximity to established residential areas. This raises concerns about cumulative impacts on health, wellbeing, and quality of life for existing residents.

The plan does not sufficiently demonstrate why alternative, less constrained or less sensitive locations could not meet the identified employment land need, and therefore the allocation is not justified.

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#### **Conclusion**

For the reasons set out above, Main Modification MM459 and the allocation of Site CH03

are considered unsound. I respectfully request that the Council and Inspectors reconsider the allocation of this site for general employment use.

Without such changes, the allocation risks causing significant harm to residential amenity, the local environment, and infrastructure, while failing to meet the tests of soundness.

Also I would clearly like to register my support for the work undertaken by the Chapeltown, Ecclesfield Grenoside Group, and endorse their submission

Yours faithfully,

Liam Cross

