



SHEFFIELD LOCAL PLAN EXAMINATION

SHEFFIELD PLAN MAIN MODIFICATIONS CONSULTATION MAY 2026

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

Submitted to: Sheffield Local Plan - Inspectors

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

Date: 04 May 2026

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Executive Summary

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

In summary, the Plan is unsound because:

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

1. Introduction and Scope

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

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

2. Failure to Assess Cumulative Impact

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

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

3. Green Belt Harm and Absence of Exceptional Circumstances

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

9. Infrastructure and Services (NPPF 20)

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

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

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

11. BMV (GS4)

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

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

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

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

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

13. Conclusion

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

CH03 (Warren Lane) – MM459

Introduction

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

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

1. Green Belt Harm/ Spatial Strategy

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

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

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

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

Figure 1: Settlement Separation and Green Belt Context



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

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

Figure 2: Settlement Separation and Green Belt Context



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

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

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

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

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

3. Transport, Highways and Access Constraints

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

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

Walking:

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

Cycling:

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

Public Transport:

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

Private Car:

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

Traffic Implications with current plan

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

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

4. Flood Risk and Drainage Issues

Flood risk has been identified as a constraint requiring mitigation.

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

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

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

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

5. Heritage and Setting of Listed Buildings

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

6. Ecological and Biodiversity Concerns

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

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

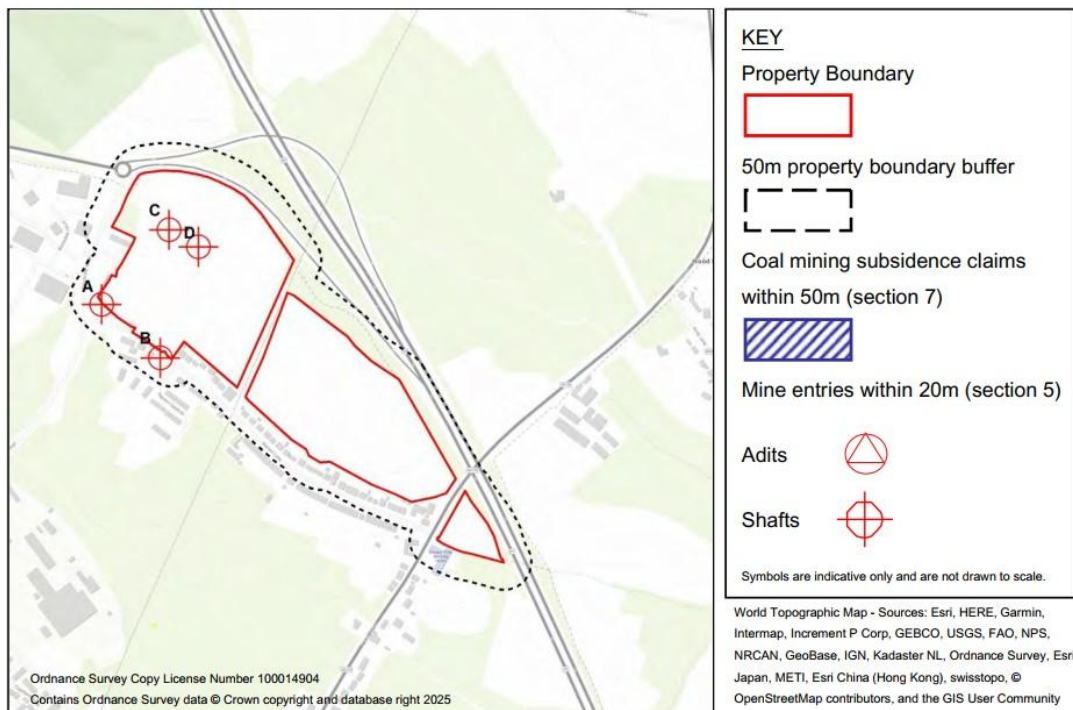
7. Mining and Ground Contamination/ Stability Risks

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

SITE LOCATION AND COAL MINING FEATURE PLAN

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

SEARCH NUMBER: 473232



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

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

Figure 3: Coal Mining Constraints and No-Build Zones

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

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

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

Buffer Constraints Plan

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

8. Residential Amenity Impacts

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

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

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

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

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

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

9. Physical and Infrastructure Constraints

The site is affected by several major physical constraints:

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

These constraints prevent built development across significant areas.

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

10. Deliverability and Phasing Uncertainty

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

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

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

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

11. Conclusion

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

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

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

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

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

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

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

CH04 (Hesley Wood) - MM460

1. Green Belt Harm / Spatial Strategy

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

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

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

3. Transport, Highways and Access Constraints

Independent Transport Evidence

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

Summary Concerns

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

4. Flood Risk and Drainage Issues

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

5. Heritage and Archaeological Assets

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

6. Ecological and Biodiversity Concerns

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

7. Mining and Ground Contamination / Stability Risks

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

- Policy ES6 requires that contamination and instability are addressed at the point of allocation. In this case, no remediation strategy or geotechnical assessment has been provided, and the Plan instead defers these matters to the planning application stage. This approach is inconsistent with policy and fails to demonstrate that the site is suitable for development.
- **Quote from Exam 188** This site comprises the spoil material from the nearby Smithy Wood Colliery and the site has a historic mining legacy, with approx. 10+ mine entries recorded within the site. It is within a DHRA and is identified as an area with probable shallow coal mine workings - in the north and east of the site where coal outcrops are also located. Given historic mining activity, any formal planning application submitted which includes layout as a consideration *should be supported by CMRA informed by site investigations to locate the mine entries and assess their condition and calculate their zone of influence to inform layout. These features are likely to require remediation. Include a condition on development requiring a CMRA.*
- This requirement has not been included in the modifications without it this site cannot be included in the plan.

8. Local Infrastructure Capacity

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

9. Deliverability and Phasing Uncertainty

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

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

10. Conclusion

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

Final Position

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

Site CH04 should be removed from the Sheffield Local Plan.

CH05 (Strawberry Fields) - MM461

1. Green Belt Harm / Spatial Strategy

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

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

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

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

3. Transport, Highways and Access Constraints

Independent Transport Evidence

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

Summary Concerns

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

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

4. Flood Risk and Drainage Issues

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

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

5. Heritage and Setting of Listed Buildings

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

associated with the farmstead buildings cannot be mitigated and would leave the Manor and Farm as orphaned heritage assets in a sea of modern housing.

- The site itself retains elements of medieval field patterns, (strip fields) which would also be permanently lost and again cannot be mitigated, or the harm minimised as per the suggestion in the main modifications.

6. Ecological and Biodiversity Concerns

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

7. Mining and Ground Contamination/ Stability Risks

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

including the railway line and Nether Lane bridge.

8. Local Infrastructure Capacity

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

9. Deliverability and Phasing Uncertainty

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

10. Conclusion

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

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

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

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

NES36 (Smithy Wood) - MM350

1. Fundamental Concerns – Suitability, Evidence & Deliverability

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

2. Irreplaceable Habitat and Ecological Isolation

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

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

3. Conflict with Existing Agricultural Use

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

4. Impact on Existing Residential Area

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

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

5. Reliance on Unresolved and Deferred Assessments

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

6. Cumulative Constraints and Reduced Developable Area

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

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

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

Using reasonable buffer calculations and the Preliminary Ecology Assessment

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

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

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

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

7. Implications for Capacity and Layout

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

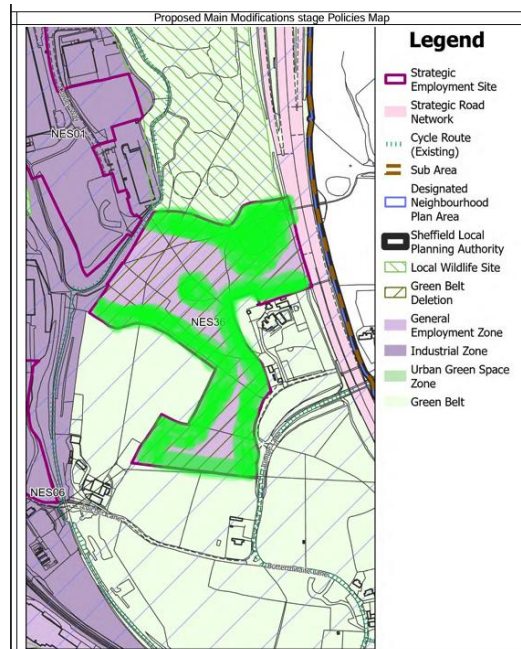


Illustration to show that the site is far more constrained than assumed in the plan.

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

8. Failure of Site Selection Due Diligence and Changing Availability

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

9. Transport and Air Quality Impacts

Independent Transport Evidence

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

Key Issues

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



Map from 1855

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

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

11. Conclusion

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

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

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

NES37 (Townend Farm) - MM351

1. Green Belt Harm / Spatial Strategy

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

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

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

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

3. Transport, Highways and Access Constraints

Independent Transport Evidence

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

Key Findings

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

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

Conclusion on Transport

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

4. Flood Risk and Drainage Issues

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

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

5. Heritage and Archaeological Considerations

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

6. Ecological and Biodiversity Concerns

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

7. Mining and Ground Conditions

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

8. Local Infrastructure Capacity

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

9. Deliverability and Phasing Uncertainty

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

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

10. Conclusion

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

The evidence demonstrates that:

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

Minimum Potential Loss of Land Area

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

Maximum Potential Loss of Land Area

Using buffers which take air, noise and light pollution into account									
Feature	Description	Irreplaceable	Must be retained	Length	Width	Buffer side 1	Buffer side 2	Hedge + Buffer	
H1	Non-native ornamental			82	2	2		328	
H2	Non-native ornamental			19	5	2		133	
H3	Native with Trees			40	3	2		200	
H4	S R Native with Trees	Y		135	5	30	30	8775	
H5	Native			92	2	2	2	552	
H6	S R Native with Trees	Y		49	4	30		1666	
H7a	S R Native	Y		62	6	30	30	4092	
H7b	S R Native	Y		84	6	30		3024	
H8	Non-native ornamental			127	3	2		635	
H9	Native			78	3	2	2	546	
H10	Non-native ornamental			41	1	2		123	
H11	Non-native ornamental			21	1	1		42	
H12	S R Native with Trees	Y		210	6	30	30	13860	
H13	Native with Trees			118	2	2		472	
H14	S R Native	Y		168	2	30		5376	
H15	Native			86	4	2	2	688	
H16	S R Native with Trees	Y		99	2	30	30	6138	
H17	S R Native with Trees	Y		171	4	30		5814	
H18	S R Native with Trees	Y		54	8	30		2052	
H19	Native			287	2	2	2	1722	
H20	Native			113	2	2	2	678	
H21	Native			33	2	2	2	198	
H22	Native			106	2	2	2	636	
H23	S R Native with Trees	Y		141	3	30		4653	
H24	S R Native with Trees	Y		112	4	30		3808	
H25	S R Native with Trees	Y		120	4	30		4080	
H26	S R Native with Trees	Y		224	3	30	30	14112	
H27	S R Native	Y		56	1.5	30	30	3444	
H28	S R Native	Y		24	5	30		840	
H29	S R Native	Y		127	3	30		4191	
H30	S R Native with Trees	Y		67	0			0	
H31	S R Native	Y		30	0			0	
L1	Valuable line	Y	Y	48	1	30	30	2928	ancient/Veteran tree buffer = 15m radius
T2	small							14.66	Non ancient/Veteran Tree buffers = radius of 12x stem width
T3	medium							72.4	Average stem buffer area
T4	large							254.5	Small tree 18 14.66
T5	medium							72.4	Medium Tree 40 72.4
T6	medium							72.4	Large 75 254.5
T7	medium							72.4	V Large 2827
T8	medium							72.4	
T9	large							254.5	
T10	large							254.5	
T11	ancient/Vete	Y	Y					2827	
T12	large							254.5	
T13	ancient/Vete	Y	Y					2827	
T14	ancient/Vete	Y	Y					2827	
T15	ancient/Vete	Y	Y					2827	
T16	ancient/Vete	Y	Y					2827	
T17	ancient/Vete	Y	Y					2827	
T18	ancient/Vete	Y	Y					2827	
T19	large							254.5	
T20	ancient/Vete	Y	Y					2827	
T21	large							254.5	
T22	large							254.5	
T23	large							254.5	
T24	large							254.5	
T25	ancient/Vete	Y	Y					2827	
T26	ancient/Vete	Y	Y					2827	
T27	ancient/Vete	Y	Y					2827	
T28	ancient/Vete	Y	Y					2827	
T29	ancient/Vete	Y	Y					2827	
T30	ancient/Vete	Y	Y					2827	
T31	ancient/Vete	Y	Y					2827	
T32	ancient/Vete	Y	Y					2827	
T33	medium							72.4	
T34	medium							72.4	
T35	medium							72.4	
T36	medium							72.4	
T37	medium							72.4	
T38	large							254.5	
	Landuse Buffer: Farm-Houses							9200	At least 50m is normal between houses and a working farm
	Woodland Buffer - East							2350	
	Woodland Buffer - Central							10572	
	Woodland Bu Y	Y						14600	At least 30m - this is possibly ancient and the fore would require air, noise and lig
								Total M sq	18.104366
								Total Ha	18.104366

Map of Townend Farm showing areas to be preserved.

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



NES38 (Holme Lane Far.) - MM352

1. Green Belt Harm / Spatial Strategy

- NES38 forms part of a cluster of Green Belt allocations, including NES36, NES37, NES39, CH03, CH04, and CH05. Collectively, these sites constitute a significant outward expansion of the settlement boundary, effectively merging Grenoside with Fox Hill.
- The Plan treats each site individually, but the true impact is cumulative: strategic urban extension rather than contained growth.
- Loss of continuous Green Belt and erosion of local identity and separation of communities.
- Over-reliance on Green Belt release despite available brownfield alternatives undermines the justification for exceptional circumstances.
- Sequential Approach: The Council has not demonstrated that all reasonable alternatives have been fully explored. Evidence indicates previously developed sites within the urban area remain underutilised, and higher-density development in sustainable locations have not been maximised. This calls into question the Plan's consistency with national policy and the sequential test (NPPF para 149).
- Predictive Agricultural Land Classification (ALC) mapping indicates that NES38 comprises Grade 2 and Grade 3a land, which is classified as Best and Most Versatile (BMV) agricultural land.
- Across the proposed Green Belt release sites, at least 121.64 hectares (approximately 53%) are identified as BMV land.
- National policy requires that BMV land should be protected where possible, and its loss should be justified through a robust assessment of alternatives.
- The allocation of NES38 therefore contributes not only to Green Belt harm but also to the loss of high-quality agricultural land, further undermining the justification for release.

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

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

3. Local Wildlife Site

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

4. Transport, Highways, Access, and Cumulative Infrastructure

Independent Transport Evidence

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

Key Points:

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

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

5. Ecological Constraints and Veteran Trees

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

Appendix A – Observed Flora and Habitat Features on NES38

Appendix B – Wildlife Observed on or Adjacent to NES38

6. Site Capacity and Deliverability

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

- Relies on unproven mitigation and future technical solutions rather than demonstrated evidence.
- Cumulative impact on layout efficiency:
 - Constraints do not simply remove land in isolation; they fragment the site and reduce layout efficiency.
 - Tree buffers, drainage features, access geometry and ecological corridors can create irregular residual land parcels that are less suitable for development.
- Indicative developable area:
- The published net developable area of 5.38 hectares does not appear to reflect the full cumulative impact of constraints.
- When allowing for LWS buffers, veteran tree Root Protection Areas, drainage/SuDS land-take, access requirements, and reduced layout efficiency, a more realistic developable area is likely to fall in the region of approximately **3.3 to 3.8 hectares** once cumulative constraints are properly accounted for.
- This represents a potential reduction of around 30–40% from the stated figure.
- Implication for capacity:
 - At typical suburban densities (30–35 dwellings per hectare), this would suggest a capacity in the region of approximately **100–130 dwellings**, significantly below the stated 188.
 - Alternatively, achieving 188 dwellings would require substantially higher densities that may not be compatible with site constraints, character, or policy expectations.
- Other constraints: topography, heritage features, and potential archaeological interest further reduce feasible buildable area.

7. Flood Risk and Drainage

- Site functions as part of a natural water management system.
- Proposed SuDS infrastructure is uphill of existing homes, raising potential downstream risk.
- No Level 2 SFRA or site-specific drainage modelling has been provided.
- Drainage land-take uncertainty:
 - The extent of land required for attenuation, infiltration, exceedance routing and maintenance access has not been demonstrated.
 - Without this information, the net developable area cannot be considered robust.

8. Heritage and Archaeology

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

9. Climate and Sustainability Impacts

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

10. Mining and Ground Contamination / Stability Risks

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

11. Conclusion

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

Appendices

Appendix A – Observed Flora and Habitat Features

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

Appendix B – Wildlife Observed on or Adjacent to NES38

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

NES39 (Wheel Lane/ Middleton Lane) - MM353

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

1. Green Belt Harm / Spatial Strategy

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

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

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

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



3. Transport, Highways and Access Constraints Independent Transport Evidence

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

Key Points

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

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

4. Flood Risk and Drainage Issues

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

5. Heritage and Setting of Listed Buildings / Archaeological Assets

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

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

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

6. Ecological and Biodiversity Concerns

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



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

Estimate MM – 353 (NES 39)

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

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

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

Supplementary notes

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

7. Mining and Ground Contamination / Stability Risks

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

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

8. Local Infrastructure Capacity

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

9. Deliverability and Phasing Uncertainty

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

10. Conclusion

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

1. Lack of Site-Specific Viability Evidence

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

2. Known Cost-Drivers Requiring Viability Testing

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

3. Inconsistency with Evidence Provided for Other Sites

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

Requested change

We request that;

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

- deliverability
- infrastructure provision
- ecological and landscape mitigation