Representation to the Sheffield Local Plan Examination

Consultation on the Schedule of Proposed Main Modifications

Submitted by: The Sheffield Green Belt Alliance **Date:** 5 May 2026

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

Dear Inspectors,

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

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

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

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

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

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1 Introduction: Site Capacities and Green Belt Release

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

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

1.1 Purpose of this Representation and Without Prejudice Position

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

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

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

1.2 "Narrow" Headroom

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

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

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

1.3 Generic Formulas vs. Actual Constraints

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

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

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

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

1.4 Evidence Chronology

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

1.5 Summary of Soundness Concern and Capacity Adjustments

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

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

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

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

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

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

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

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

2 MM331: NWS30 Land at Forge Lane

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

2.1 The site-specific evidence

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

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

2.2 Why the lower ratio is more realistic

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

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

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

2.3 Realistic capacity

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

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

3 MM332: NWS31 Land between Storth Lane and School Lane

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

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

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

3.1 Why the lower developable area is more realistic

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

In particular, the site must allow for:

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

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

3.2 Density

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

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

3.3 BNG and Green Belt mitigation

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

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

3.4 Conclusion

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

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

4 MM351: NES37 Land between Creswick Avenue and Yew Lane

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

4.1 The Mathematical Difficulty of the 90% Ratio

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

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

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

4.2 Apportioning Site-Wide Constraints

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

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

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

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

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

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

4.3 Qualitative Constraints and Fragmentation

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

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

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

4.4 Conclusion: A Credible Capacity Range

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

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

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

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

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

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

5.1 The Mathematical Shortfall

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

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

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

5.2 Spatial and Policy Constraints Reducing Capacity

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

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

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

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

5.3 The Limits of Multi-Functional Green Infrastructure

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

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

5.4 Conclusion: Realistic Capacity Estimate

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

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

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

6 MM353: NES39 Land at Wheel Lane and Middleton Lane

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

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

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

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

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

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

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

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

6.1 Layout and Infrastructure Severance

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

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

6.2 Realistic Yield and Conclusion

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

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

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

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

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

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

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

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

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

7.1 The Density Contradiction and Landscape Sensitivity

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

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

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

7.2 Masterplan Deficits and Severe Site Fragmentation

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

These "masterplan deficits" - described in D - include:

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

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

7.3 Conclusion

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

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

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

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

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

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

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

8.1 The Mathematical Impossibility of the 90% Ratio

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

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

8.2 Apportioning Site-Wide Constraints

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

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

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

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

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

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

13.9 ha (total hard constraints) × 74.5% = 10.36 ha (housing's proportional constraint).

8.3 Qualitative Constraints and Fragmentation

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

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

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

8.4 Conclusion: A Credible Capacity Range

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

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

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

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

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

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

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

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

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

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

9.1 Quantified site constraints

The following quantified requirements alone total approximately 3.92 hectares:

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

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

9.2 Further site-specific land requirements

A realistic masterplan would also need to allow for:

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

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

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

9.3 Contextual density

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

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

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

9.4 Realistic yield and conclusion

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

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

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

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

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

10.1 Why the Council's assumed NDA is not realistic

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

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

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

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

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

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

[2] MM440 incorrectly specifies a 6m buffer.

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

10.2 Appropriate density

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

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

10.3 Conclusion

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

11 MM441: SWS19 Land to the north of Parkers Lane

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

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

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

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

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

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

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

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

12 MM461: CH05 Land to the east of Chapeltown Road

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

For CH05, this generates: 19.62 hectares × 70% = 13.73 hectares net × 40 dph = 549 dwellings.

12.1 Spatial Constraints

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

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

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

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

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

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

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

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

12.2 Outstanding Technical Work

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

12.3 Contextual Density and Conclusion

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

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

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

13 Conclusion

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

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

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

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

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

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

Appendix A Schools and Burial Grounds Cannot Satisfy Policy NC15

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

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

Appendix B NES37 Quantification of Ecological Constraints

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

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

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

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

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

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

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

Appendix C NES39 Detailed Constraint Analysis

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

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

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

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

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

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

Appendix D SES29 Detailed Constraint Analysis

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

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

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

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

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

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

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

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

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

Appendix E Map of Constraints on SES29

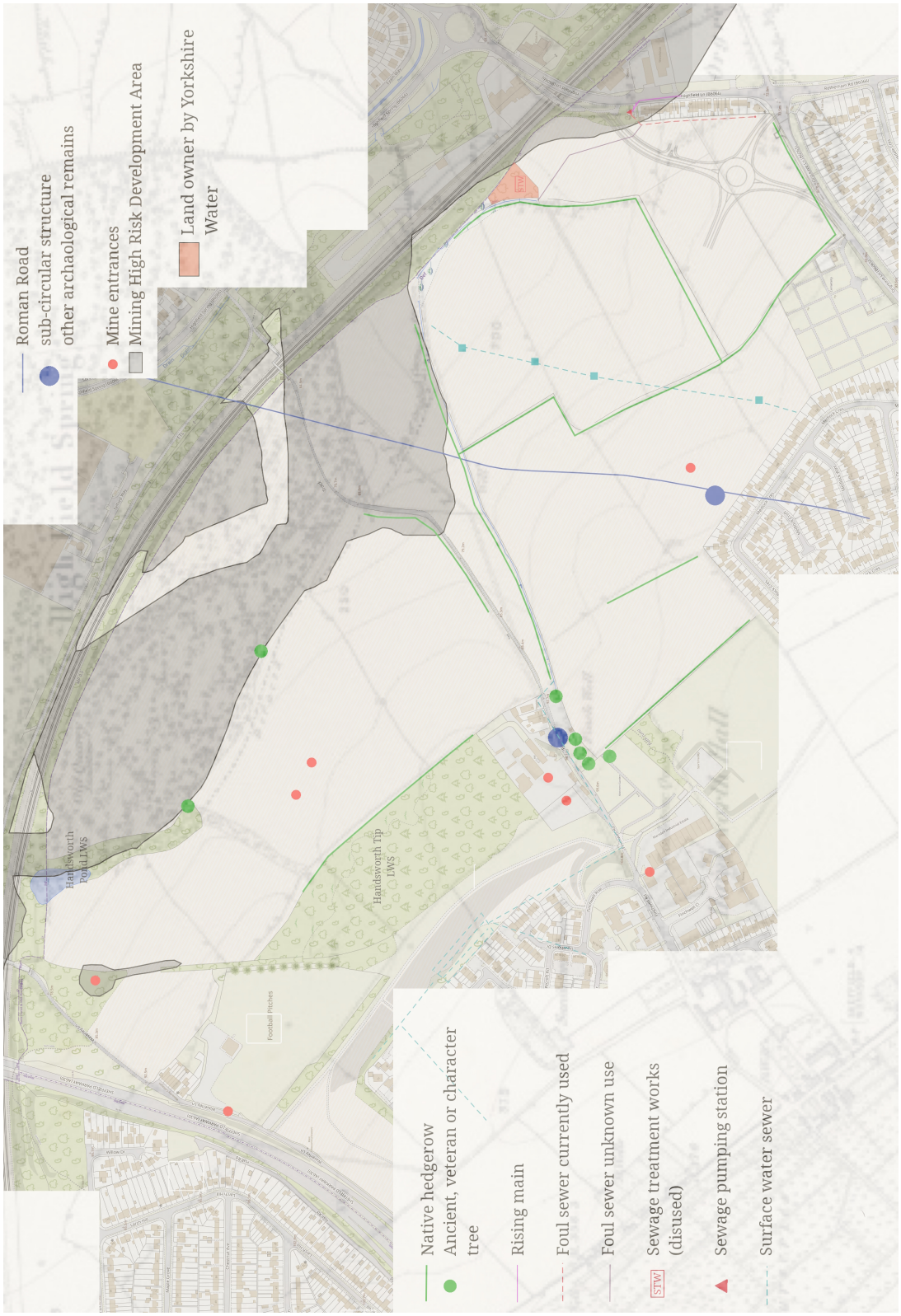

Figure 1: Map of Constraints on SES29.

Appendix F SES30 Quantification of Ecological Constraints

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

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

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

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

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

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

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

- **LWS Buffer Area:** 1,300m × 15m = 19,500m^2 = **1.95 hectares**
- **Watercourse Buffer Area:** 820m × 16m = 13,120m^2 = **1.31 hectares**
- **Total Buffer Area:** 1.95 ha + 1.31 ha = **3.26 hectares**

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

Appendix G SS19 Robin Brook Buffer Constraints

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

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

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

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

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

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

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

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

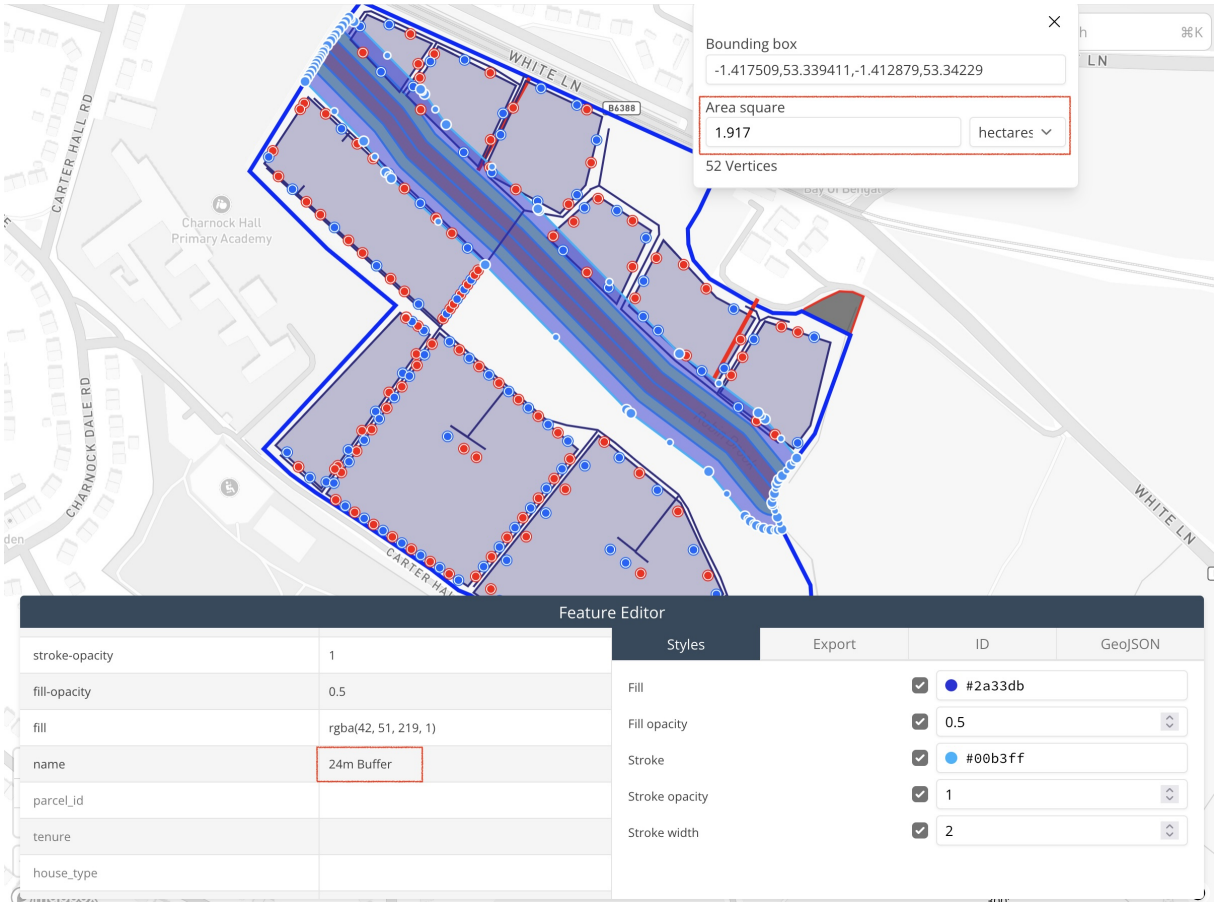

Figure 2: Geospatial mapping of SS19.

Appendix H Maps of SWS18 Constraints

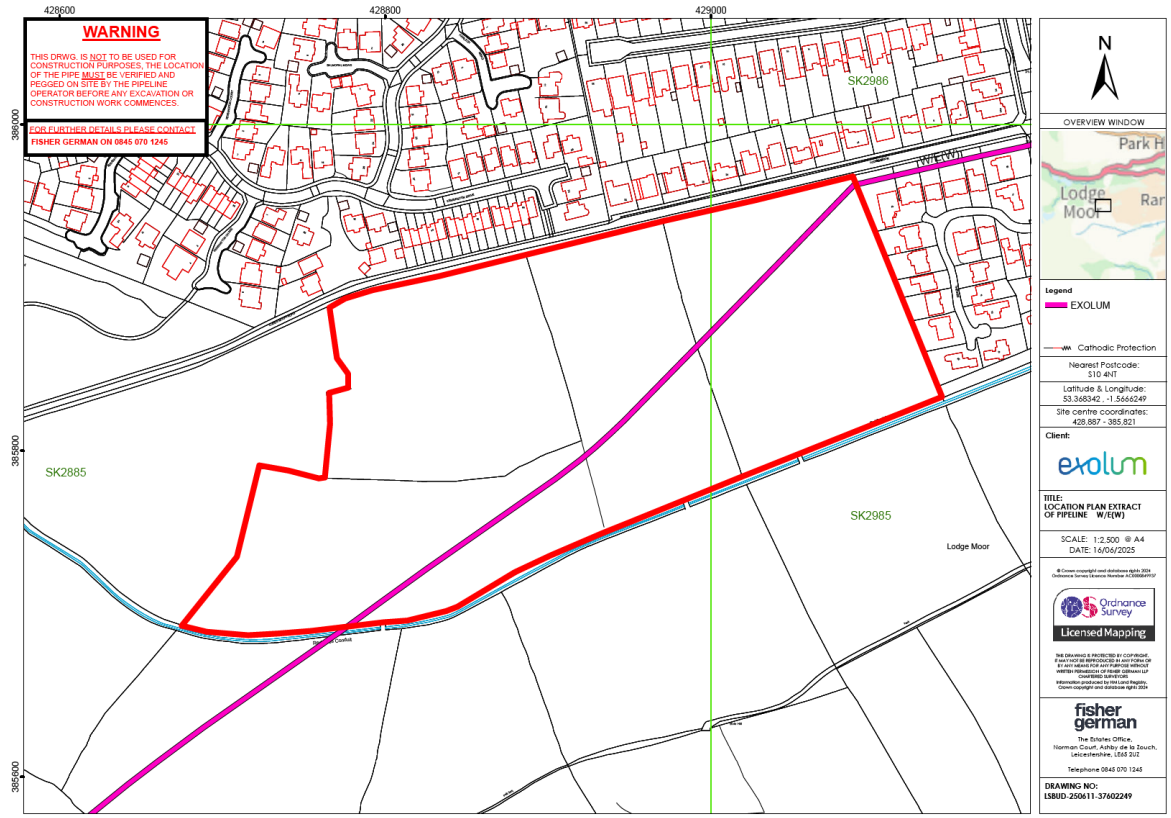

Figure 3: Location of the Exolum pipeline as it runs across SWS18 [41].

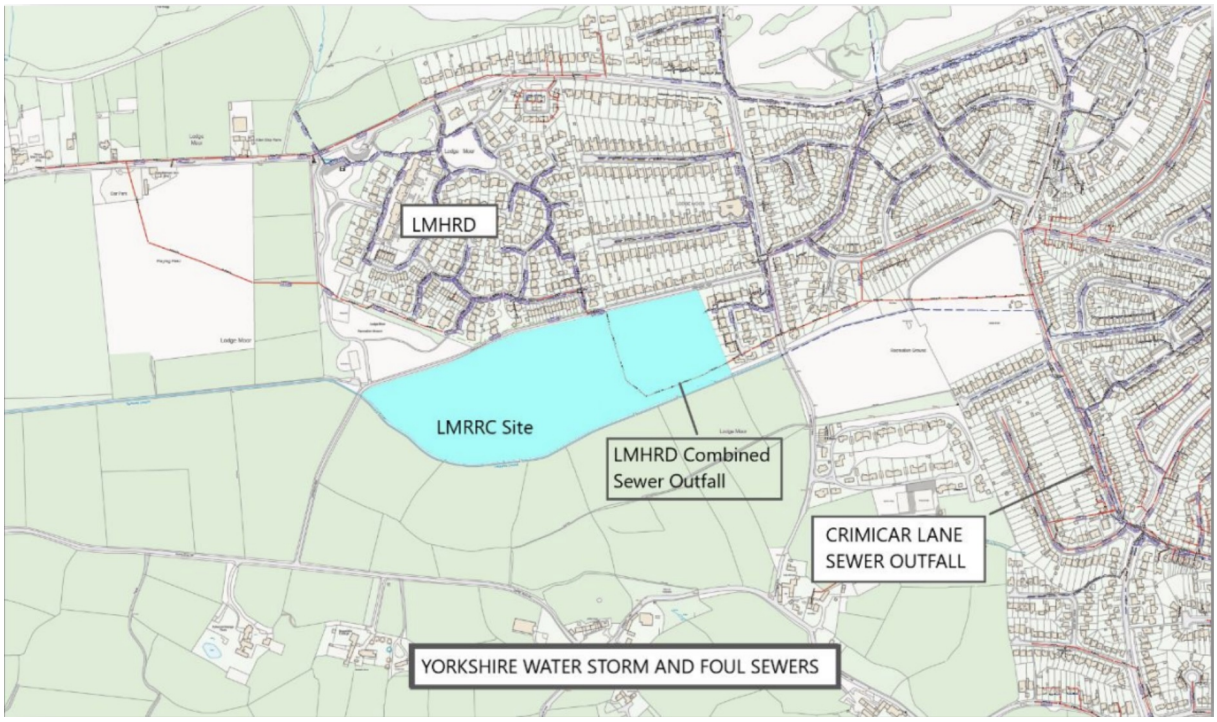

Figure 4: Location of the Yorkshire Water combined sewer on SWS18.

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