

From: Michael Parkin [REDACTED]
Sent: 11 July 2025 11:11
To: SheffieldPlan
Cc: [REDACTED]
Subject: Submission for "Sheffield Plan - proposed additional site allocations"
Attachments: michaelparkin-submission-compressed.pdf

Dear Strategic Planning Team,

Please find attached my submission regarding the proposed additional site allocations.

Kindly confirm that the document has been received, is readable, and has been logged for forwarding to the Inspectors.

Regards,

Michael Parkin

[REDACTED]
[REDACTED]

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

Dear Planning Inspector,

Sheffield Plan: Proposed Additional Site Allocations, May 2025

I am writing to formally object to the inclusion of the land between Bramley Lane and Beaver Hill Road, S13 7JH (SES30) in the proposed changes to the draft Sheffield Plan. I wish to see SES30 removed from the plan and the local community be given the opportunity to make its own proposals for what happens to the site.

In accordance with the consultation documentation, I confirm that:

- I wish to be kept updated in respect of the Sheffield Plan and its public examination;
- I wish to attend future hearing sessions; and
- I support the Hands Off S13 Greenbelt group speaking on behalf of local residents.

Summary

This submission does not object to the need for a Sheffield Plan or more housing in Sheffield. Rather, it objects to the disproportionate impact the allocation of SES30 will have on Handsworth, a relatively small area in South East Sheffield, and how Sheffield City Council has carried out the additional site allocations when proposing changes to the draft Sheffield Plan.

I do not consider the allocation of SES30 to be sound:

- It is not **justified**. The inclusion of SES30 is based on a flawed and inconsistent site selection process. Sheffield City Council bypassed its own selection criteria for protecting open space, relied on unsupported indicator scores, and failed to properly consider the cumulative impact of the extensive development already planned in the area;
- It is not **effective**. The proposed access to the site is unworkable, traffic impacts cannot be adequately mitigated, and the development would place unmanageable pressure on overstretched and constrained local road infrastructure;
- It is not **consistent with national policy**. The allocation contradicts National Planning Policy Framework (NPPF)¹ principles on community engagement [2, para. 16(c), 39, 127], and the need to improve air quality and public health [2, para. 19, 185].

The objection detailing the grounds for unsoundness is on pages 2–9. Supporting evidence is provided on pages 11–19 and references are on pages 20–22.

¹All references are to the July 2021 version of the NPPF [1, para. 4].

1 Strategic context: development around SES30 (2012–2039)

Several major housing developments have been or are planned to be delivered within a 2 km radius of SES30, as shown in Figure 1.

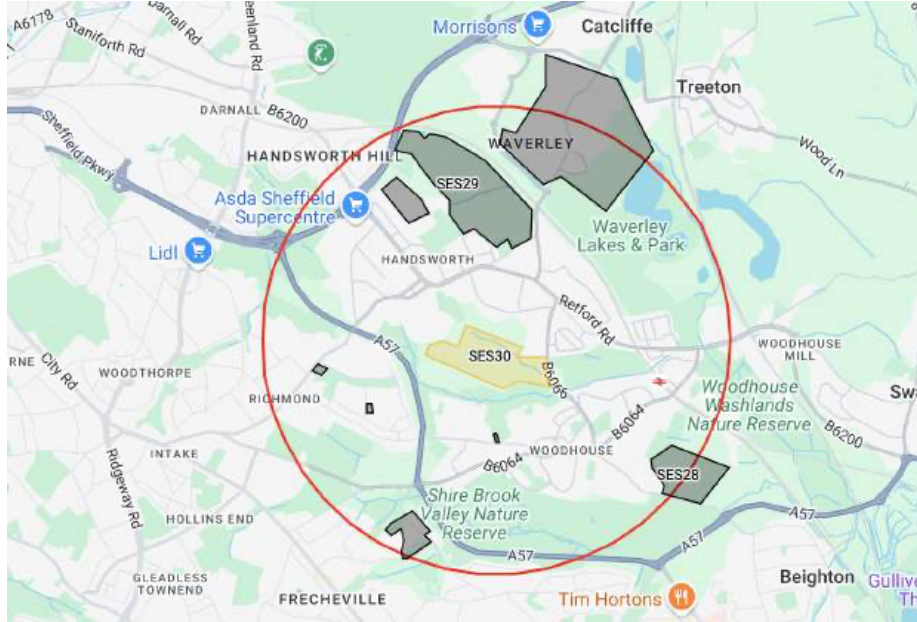


Figure 1: Map of 2 km radius centered on SES30 [3].

Approximately 1.5km north of SES30 lies Waverley, a major urban development on the former site of the Orgreave coking plant. Construction began in 2012 and over 1,700 homes have been completed so far [4]. The Waverley masterplan allows for a total of 3,890 homes [5], meaning around 2,200 more homes are still to be delivered. The scheme also includes up to 2.1 million sq ft of industrial and logistics space [6] and 190,000 sq ft of retail and leisure space [7]. It is a current and future source of population growth, emissions and traffic in the Handsworth area.

Sheffield City Council does not include Waverley in their plans because it falls just inside the Rotherham boundary. In practice, Waverley is closely connected to Handsworth. Children from Waverley attend schools in the Handsworth area,² and many Waverley residents rely on Handsworth doctors and dentists. Travel patterns also reflect this, with traffic from Waverley using Rotherham Road and Beaver Hill Road – directly past SES30 – as the main route to and from Woodhouse, Crystal Peaks and beyond. It has had a huge effect on our community already.

Waverley is not the only source of new development in the area, however. Table 1 (page 11) summarizes completed and planned housing developments within a 2 km radius of SES30. It shows that since the start of the Waverley project until the end of the draft Sheffield Plan there will be at least **5,821** homes added to the area, excluding SES30.

With SES30, the total number of built or planned dwellings in this radius is at least **6,689** – a huge concentration of growth for a single community. If completed units are discounted, at least half of the remaining homes are still destined for this small area before the end of the Plan.

²Waverley Junior Academy has been oversubscribed since 2021 and “this trend is set to continue in future years” [8]. Waverley does not have a secondary school.

This raises a significant concern: this allocation process does not fully consider the cumulative impacts of recent and proposed developments in a single area. As a result, the process lacks a strategic perspective for Handsworth.

SES30 adds to the cluster of developments in Handsworth that, cumulatively, risk creating an unsustainable concentration of growth. This undermines key principles in the NPPF — particularly sustainable development [2, para. 8], infrastructure capacity [2, para. 34], and the importance of well-designed, socially cohesive places [2, para. 130–134]. In the meantime, areas of Sheffield that desperately require houses will not have their needs met. In practical terms, releasing this site would simply provide growth that is neither necessary nor sustainable.

I respectfully urge the planning inspectors to remove SES30 from these allocations in order to relieve the unsustainable burden this development will place on Handsworth.

2 Site composition

SES30 consists of two parcels: S03020 and S02502. In the *Sheffield Open Space Assessment (2022)*, parcel S02502 is designated “accessible natural greenspace” [9, Fig. 3]. Sheffield City Council’s updated Policies Map [10] and its online interactive map [11] both colour this parcel a shade of green that is absent from either legend. Figure 2 illustrates the online map, showing the parcel’s distinction from the surrounding housing and agricultural land, the local wildlife site to the south, and the school playing fields to the north.

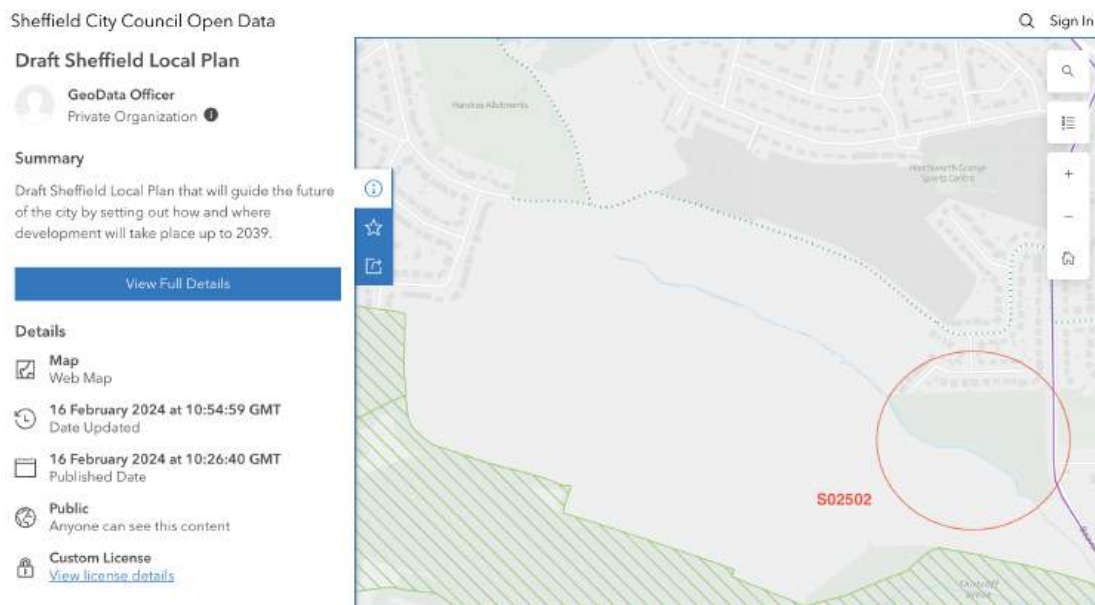


Figure 2: The online Policies Map (screenshot taken 16th June 2025).

Because the map legends are inconclusive, the parcel is treated as *open space* as this aligns with the existing-use description in other supporting documents (e.g., [12, p. 1]). Actual use reinforces this interpretation: local residents use the land for recreation, families for play, and children for nature study [13]. For 58 years it has served as an active informal open space for the community.³ As evidence, Photographs 3a and 3b (page 12) show local residents using S02502 for informal

³Prior to 1967, it was part of The Royal Nurseries of Fisher, Son & Sibray.

sports races in June 1977 as part of the Queen’s Silver Jubilee.

This definition matters because the *Selection of Sites for Green-Belt Release Topic Paper* states [emphasis added]: “sites were rejected where the **entire** site was identified as being open space or outdoor sports use” [14, para. 3.10(c)]. Appendix 7 of the same paper excludes green-belt sites on the “fundamental constraint” that they are wholly or partly “active informal open space”. Although a formal definition could not be found in the Council’s documents, it plainly covers regularly used community open space such as S02502.

Under this criterion, S02502 should have been excluded from further consideration. It is **entirely** active informal open space. However, S02502 was included in the allocations solely because it was combined with the adjacent parcel S03020 to form the larger site SES30. This grouping is justified on the grounds that S02502 would serve as the main access point to S03020; “the sites therefore need to be considered together” [14, p. 42].

I.e., S02502 is *de facto* active informal open space, and supporting documents confirm this. Yet in the additional site allocations, it is proposed for development – not on its own merit, but **purely due to its role as an access route to another parcel**. By combining one parcel that should be rejected with another parcel, the Council has been able to bypass its own site selection criteria, since the grouped parcels could no longer be classified **entirely** as open space.

This makes the inclusion of SES30 unsound: if it were not for S02502, S03020 could not be included due to access restrictions. The grouping together of these two parcels undermines public confidence in the planning process as it demonstrates that Sheffield City Council is able to override its own rules to serve its own interests, rather than uphold transparent and consistent standards.

Any decision which differs between parcels with the same designation (such as active informal open space) may give rise to the perception of bias and pre-determined outcomes. SES30 must be removed from these allocations to remove this perception.

3 Site access, traffic and air quality impacts

There are three potential access points to SES30 [14, p. 42]. Council officials have informed me that two are wholly inadequate:⁴

- **Beaver Avenue** is a single-track road bordered by fenced school playing fields. The limited access area is used for parking by archery and football clubs using the fields.
- **Bramley Lane** is a single-track bordered by private land, allotments and protected trees. Residents use the approach for parking. Often, bins aren’t emptied because refuse collection vehicles cannot access roads due to ad-hoc parking.

This leaves Beaver Hill Road (the B6066) as the sole access point to SES30. However, the B6066 is already under severe pressure even before the addition of SES30.

⁴At a public Sheffield City Council drop-in event on 23rd June 2025, Mr. Chris Hanson – Principal Planning Officer – told me that owing to site constraints all access to SES30 will be via Beaver Hill Road.

⁵It was not possible to gather photographic evidence as the consultation period was outside the football season.

Traffic Issue	Impact on B6066
South Yorkshire Fire & Rescue Training Centre	Visitors overwhelm the on-site car park; overspill parking on both verges reduces the carriageway to a single-lane. Photographs 4a–4f show the ad-hoc parking around the access point for SES30.
Flockton Park football pitches	No dedicated parking. Players and spectators park along B6066 blocking access to SES30; the road frequently operates as a single-lane for several hours each Saturday and Sunday morning. ⁵
Handsworth Grange School	School-run pick-up/set-down blocks Beaver Hill Road, Schubert Close and Beaver Avenue, regularly preventing scheduled buses from turning left into Handsworth Grange Road, forcing residents to wait.
Handsworth Grange Community Sports Centre	Sporting events create further overspill onto the same residential streets, extending peak parking stress.
Flooding	The B6066 often floods (e.g., [15, para. 1.6.3]) cutting off the south-bound route to Woodhouse. This forces all traffic from Handsworth Grange School, Beaver and Flockton estates north onto Retford Road.

These existing road users will face further competition from all traffic in and out of SES30. Including SES30 has put the Council in a catch-22. To make access to the site viable it would have to provide new parking for existing road users. That parking can only go in two places:

1. East of the B6066, sacrificing yet more green-belt; or
2. In SES30, reducing the developable area and the housing numbers the Plan depends on.

Either outcome undermines the allocation and reveals how little the Planners understood the site when making the proposal to allocate. Worse, even with new parking the development would still channel thousands of additional vehicle movements onto the B6066.

A TRICS calculation using publicly-available data in Table 3 (page 17) shows that 868 dwellings would generate between **5,800–7,800** weekday vehicle trips (600–780 trips per peak hour).⁶

A new Lidl supermarket 700m north of the SES30 access is scheduled for late 2025 [16] and is expected to add another **1,800–2,600** weekday vehicle trips (180–300 per peak hour) to the local area. Table 4 (page 18) shows the calculations. Woodhouse does not have a big supermarket, so many of these trips are likely to travel along the B6066, the most direct route.

The allocation of SES29 would generate another **5,200–6,900** weekday vehicle trips. See Table 5 (page 18) for the calculations. While all this traffic will not be via the B6066, it will be another source of traffic on nearby Rotherham Road and Retford Road and in the local area generally.

This projected traffic increase in Handsworth is supported by the *Report on Local Road Network Impacts & Potential Mitigation*, which identifies **three of the nine** road junctions in Sheffield requiring mitigation due to the Plan being within a mile of SES30 [17, para. 1.3.1].

The specific mitigation for SES30 is to install traffic lights at the junction of the B6066 and Retford Road. This is the only solution possible because “there is insufficient space to construct

⁶This figure does not include the trips to the proposed secondary school or burial ground as there was insufficient detail to perform an objective calculation – the actual number of trips will be higher.

a roundabout” [17, para. 6.4.6], demonstrating how the local road network is constrained and cannot be upgraded or widened to accommodate more traffic.

With mitigation, modelling forecasts a PM peak queue of 52 vehicles on Retford Road [17, para. 6.4.5], resulting in a tailback of over 300 metres.⁷ This will block the junction with Rotherham Road causing further queues for traffic coming from SES29, Waverley and Parkway/Catcliffe, as well as for those exiting the Lidl supermarket. Since the *Report on Local Road Network Impacts* was written at least one month after the proposal to allocate SES30,⁸ none of these cascading, cumulative effects were taken into account in this allocation, which is worrying.

Therefore, several thousand extra traffic movements each day on the B6066 would pass dense housing – the Badger, Beaver, Flockton and Ballifield estates – and Handsworth Grange School, increasing exposure to traffic danger, noise and exhaust fumes for vulnerable older residents and school-children. In rush hour, there would be gridlock on surrounding roads.

Road traffic is the main local source of nitrogen dioxide (NO_2) and a major contributor to PM2.5, for which there is no safe limit [18]. Sheffield City Council’s *2024 Air Quality Annual Status Report* [19] ranks Parkway/Handsworth NO_2 levels among the city’s highest; the area also sits inside the city-wide Air Quality Management Area (AQMA).

Areas with lower-than-average life expectancy often face both high levels of deprivation and poor air quality [20]. In Handsworth, life expectancy is below the city average [21]. Unnecessarily increasing traffic emissions in Handsworth will only entrench existing health inequalities.⁹

The NPPF is explicit: planning policies and decisions must ensure that new development is appropriate for its location, having regard to the likely – and cumulative – effects of pollution on health, living conditions, and the natural environment [2, para. 185]. The Planning Practice Guidance (PPG) on Air Quality reinforces the NPPF by requiring plans and decisions to consider the combined vehicle-emission burden of multiple schemes [22, para. 002].

In Handsworth, the multiple schemes documented in Section 1 will add substantial traffic to a road network where air quality monitors have breached – and are currently close to breaching again – legal limits. Allocating SES30 would raise pollution further, push average life expectancy further below the city average, and remove nearly all of the green-belt land that currently acts as a buffer against airborne pollutants, thereby reducing residents’ quality of life.

In summary, 868 new homes, a school and a burial ground in an area already experiencing traffic and air quality problems – when the **only** narrow access route passes within metres of school buildings and playgrounds – is inconsistent with national policy and the Council’s responsibility to protect public health. Respectfully, SES30 must therefore be removed for this reason.

⁷Assuming average car length of 4.5m and average spacing of 2m.

⁸Proposal to allocate made public on 24th April, the *Report on Local Road Network Impacts* is dated 23rd May.

⁹In addition to the Plan’s lack of concrete provision to expand health services to support thousands of new Handsworth residents.

4 Selection criteria

The site selection methodology the Council followed “the same broad approach as in the Site Selection Methodology (January 2023)” [14, para. 3.1]. While the updated Sustainability Appraisal (SA) reconsidered all relevant candidates, each site’s *Distance to Core Public Transport Network (CPTN)* indicator score was locked to a reduced 2025 CPTN baseline [14, para. 3.16].

Using the reduced baseline “resulted in a large number of sites scoring significantly poorer under this SA indicator than they would have done under the previous CPTN network”, but also in the next paragraph it hints that in future the network would improve “in areas where significant new development is planned” [14, para. 3.17].

The approach seems to create another catch-22: by freezing the *Distance to CPTN* score to the reduced 2025 network, many sites are rated significantly poorer, and those low scores then bar the plans for new development to improve the CPTN.

Further, the approach also removed mechanisms available in previous consultations that would allow a promoter to improve a low score, by barring any new evidence that could adjust it; promoters had no formal chance to submit a costed bus package (or similar mitigation).

The methodology therefore shrinks the remaining pool of sites artificially, by treating candidate sites more severely than would have been the case had the full mitigation pathway (developer bus funding, pooled levies, or SYMCA packages) been left open. That is a failure in methodological consistency from previous assessments and undermines the justification of the proposed allocations.

These may seem like technical details. However, the proposed removal of almost all green belt in Handsworth represents a massive, largely unpopular change to the community. Because the additional site allocations concentrate their impact in a single small area, the selection process must meet the highest standards of transparency, fairness and accuracy.

Unless Sheffield City Council can show that it actively explored ways to raise the scores of other Green Belt sites – for example, by funding CPTN-route upgrades – the objectivity of the process remains in doubt. Without that analysis, the choice of SES30 over alternative sites is neither fully explored nor fully justified.

Distance to the CPTN is only one of 22 criteria in the scoring matrix, yet the same lack of rigor in site selection is evident elsewhere. Table 2 (page 15) and Figure 5 (page 16) shows how many of SES30’s indicator scores are based on misleading criteria, assumptions and factual errors.

In summary, the indicator scores used by Sheffield City Council in this allocation are flawed:

- Promoters have no opportunity to improve site scores to make the selection pool larger;
- Indicators are scored without reference to supporting data;
- Assertions and assumptions replace evidence;
- Necessary reports were delivered only after indicator scores were set;
- Critical indicators, e.g., local road network impacts, are absent.

These points cast doubt on the validity of the assessment. This makes the inclusion of SES30 unsound as it lacks a robust and credible evidence base, and it should therefore be removed from the additional site allocations.

5 Conflict of interest, failure to engage the community

Sheffield City Council owns SES30 and it also decides which green-belt sites to release. That dual role creates a clear conflict of interest: the Council gains from allocating its own land.

The NPPF requires decisions to be transparent, fair and accountable; any process in which the decision-maker benefits is, by definition, open to bias. Yet the Council itself evaluated SES30, commissioned the supporting studies, and then chose to allocate the site – without any independent comparison to non-Council-owned green-belt parcels.

Given this inherent conflict, the justification for including SES30 must be exceptionally robust and demonstrably in the public interest. This standard has not been met. The evidence presented does not clearly or convincingly establish why this site must be included, since:

- This site performs a moderate to strong green belt function [23];
- Section 1 highlights the significant development already planned in the area through 2039;
- Section 2 outlines how the allocation overrides the protection of open space;
- Section 3 explains the adverse impact on public health associated with this development;
- Section 4 questions the reliability of the indicators used to justify the site’s selection.

This problem is made worse by the Council’s failure to involve the local community in this allocation process. Meaningful consultation is especially vital when the Council’s own interests are at stake, yet those most affected were left entirely out of these decisions.

Sheffield City Council’s *Statement for Community Involvement (SCI)*, describes processes for “preparing the local plan” [24, para. 2.13] and “supplementary planning documents” [24, para. 2.18]. However, this consultation is specifically for “potential changes to the draft Sheffield Plan” [25].

In an email dated 23rd June 2025, a Planning Department Officer confirmed to me there is “no specific section in the SCI for changes to the Sheffield Plan”. Accordingly, the Council cannot be judged either compliant or non-compliant with the SCI on this point, as it sets out no applicable process. This absence of a clear procedure may explain why the Council feels it can proceed without engaging residents. While this may not breach the SCI in technical or legal terms, it undermines the purpose of the SCI and effectively nullifies its intention.

The NPPF is clear, however: early, effective engagement with communities is essential in plan-making. It emphasises that plans should be shaped with the active involvement of local people, so that outcomes reflect the needs and aspirations of those most affected.

As the Inspectors are aware, the following NPPF paragraphs apply directly:

- **Paragraph 39:** “Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community.”

- **Paragraph 16(c):** Plans should “be shaped by early, proportionate and effective engagement between plan-makers and communities.”
- **Paragraph 127:** “Design policies should be developed with local communities so they reflect local aspirations . . . ”

The NPPF, in both spirit and letter, promotes early and meaningful community involvement. While some engagement took place during the original preparation of the Sheffield Plan, no engagement whatsoever was carried out with the Handsworth community before the Plan was updated to remove almost all our green belt and replace it with 1,638 houses, a secondary school and a burial ground.

Given the scale and significance of these proposed changes to Handsworth, the total lack of consultation cannot reasonably be considered “proportionate” under the standards set out in the NPPF. Without genuine engagement, the allocation of SES30 cannot claim to reflect the community’s needs or aspirations, and, respectfully, it must be removed.

6 Conclusion

In preparing this submission, the evidence reveals a pattern: Sheffield City Council has relied on incomplete and inaccurate data to justify critical decisions regarding green-belt site allocations, pursuing a process that was both rushed and inadequately scrutinised.

The insufficient scrutiny is demonstrated by the timeline of these proposals. Sheffield City Council’s Strategy & Resources Policy Committee approved the allocations on 30th April 2025 – three full working days after they were announced. This raises concerns about whether the Committee had a genuine opportunity to assess the proposals. Indeed, Cllr. Levery said this explicitly: “Clearly, members could not read and digest all the content in the few days leading up to the meeting” [26].

Further compounding this issue, the full Council voted to approve the proposals on 14th May 2025, well before the publication of many supporting documents, as shown in Table 6 (page 19). Without these reports, Councillors were voting without a clear understanding of the potential implications, risks, and alternatives to the SES30 allocation.

Evidently, the allocation of SES30 has been made without proper consideration and scrutiny of the long-term consequences. The proposal would result in the removal of almost all Handsworth’s green belt and compound the issues associated with the already significant volume of housing development in the area until the end of the draft Sheffield Plan in 2039.

In conclusion, I believe the allocation is unjustified, ineffective, and inconsistent with national planning policy. It puts residents’ health and well-being at risk and will reduce their quality of life. For these reasons – along with other serious shortcomings not detailed here for brevity – SES30 should be removed from the additional site allocations.

7 Personal statement

I grew up in Handsworth, went to school at Ballifield, Handsworth Grange, and nearby Richmond College. I now live [REDACTED] from SES30. I've spent years walking these fields; I know them like the back of my hand. I pass trees I once saw as saplings. I follow paths and hedgerows that have shaped this landscape for centuries – and shaped me too. SES30 is not just part of a map – it is part of me.

Planning documents overlook what this space really offers. SES30 is well-used and well-loved; people come here to walk, reflect, and connect. It supports wildlife, provides peace and openness, and gives the community room to breathe. Planners may argue that the footpaths will stay and that new open spaces will be created, but a fenced path between houses – or a landscaped loop around a burial ground – is no substitute for the freedom of walking across open fields.

I see families here, people walking dogs, and children picking blackberries, pears and apples in the orchard where Myrtle Bank Farm once stood. These everyday moments may not show up in spreadsheets, but they matter deeply to the people who spend time here.

If this land is built on, those moments will be lost – taken from everyone who might have grown up knowing it and making memories here, as my family and I have.

Yours sincerely,

Michael Parkin, PhD.

8 Supporting evidence

8.1 Past and future developments within 2km of SES30 (2012–2039)

Development	Dates	Number of Homes	Source
Land At Finchwell Road And Quarry Road	2012	306	[27]
Waverley	2012–ongoing	3,890	[5]
Flats on Handsworth Road	2016–ongoing	27	[28]
Further homes on Quarry road	2019	16	[29]
Stone Fold, Hall Road	2018–ongoing	7	[30]
Oakley Road, Halesworth Road	2022–ongoing	30	[31]
Medlock Sports Ground	2025–ongoing	60 (estimated)	[32]
Land at Furnace Lane	2025–ongoing	50	[33]
SES08	2026–2039	272	[34]
SES19	2026–2039	27	[34]
SES20	2026–2039	27	[34]
SES21	2026–2039	26	[34]
SES22	2026–2039	21	[34]
SES23	2026–2039	20	[34]
SES25	2026–2039	14	[34]
SES28	2026–2039	258	[34]
SES29	2026–2039	770	[14]
Total		5,821	

Table 1: This list is not intended to be exhaustive; there may be additional homes and developments that have been or are to be delivered within 2km of SES30.

8.2 Demonstrated informal use of S02502, June 1977



(a) Beaver Drive is on the right.



(b) Beaver Drive is in the background.

Figure 3: Informal use of S02502.

8.3 Fire Training Center Parking, 25th June 2025



(a) Looking south. SES30 is on the right.



(b) Looking south. SES30 is on the right.



(c) Looking south. SES30 is on the right.



(d) Looking north. SES30 is on the left.

Figure 4: Photos taken on Beaver Hill Road (part 1 of 2).



(e) Outside the Fire Training Center



(f) Looking north

Figure 4: Photos taken on Beaver Hill Road (part 2 of 2).

8.4 Faulty indicator scores for SES30

Indicator	Indicator Score Result	Comment
Distance to CPTN	“Some of the site is within ... a 400m walk from a 3 bus-per-hour bus stop” ¹⁰	Data gap – the vast majority of the site sits well beyond that range. Steep terrain on Beaver Hill Road makes access to public transport difficult for older people or anyone with limited mobility.
Availability of local facilities and education capacity	“Current surplus capacity for Early years, Primary and Secondary education”	Contradicted by Council data showing education providers are oversubscribed, with primary and secondary schools running at full capacity and maintaining waiting lists [35][36].
Availability of local facilities	“No community / leisure / recreation facilities on-site”	Context ignored – the entire site is a community leisure and recreation facility.
Loss of onsite Open Space	“Site not on a Local Green Space”	Incorrect assertion – Section 2 describes how part of the site (S02050) functions as de facto green space, supporting wildlife corridors, informal recreation, and visual amenity.
Loss of best and most versatile agricultural land	“Likely to be Grade 3 land but site-specific survey required to determine whether any Grade 3a land”	Tentative Grade 3 label obscures the potential presence of Grade 3a soils. Without a detailed Agricultural Land Classification survey, the irreversible loss of high-quality farmland – and its strategic food security role – is unquantified and unmitigated.
Archaeology constraints	“Little or no archaeological constraints”	Incorrect assumption – “[SES30] contains an area of known archaeological interest and has potential for associated remains to survive across a wider area. These remains are considered of up to moderate significance. Development should be informed by appropriate archaeological assessment/evaluation ...” [37, para. 5.4, 5.5].
Flood risk	“Unlikely to be significant flood risks but Level 2 SFRA required to confirm any detailed mitigation”	Downplays nearby medium-high flood-hazard zones, and their impact on the River Rother. Score not informed by the Level 2 SFRA, which arrived <i>after</i> the score was set – i.e., a score was determined before the risk analysis, undermining both sequential/exception testing and climate-change mitigation.

Table 2: Erroneous and assumption-based indicator scores for SES30

Site SES30 scores highly on the indicator *Sufficient open space in the surrounding area – more than 20% above policy standard*. Similarly to other scores, no data is provided to support this score, but Figure 5a presents a map that shows open space surrounding SES30 [38, p. 45].

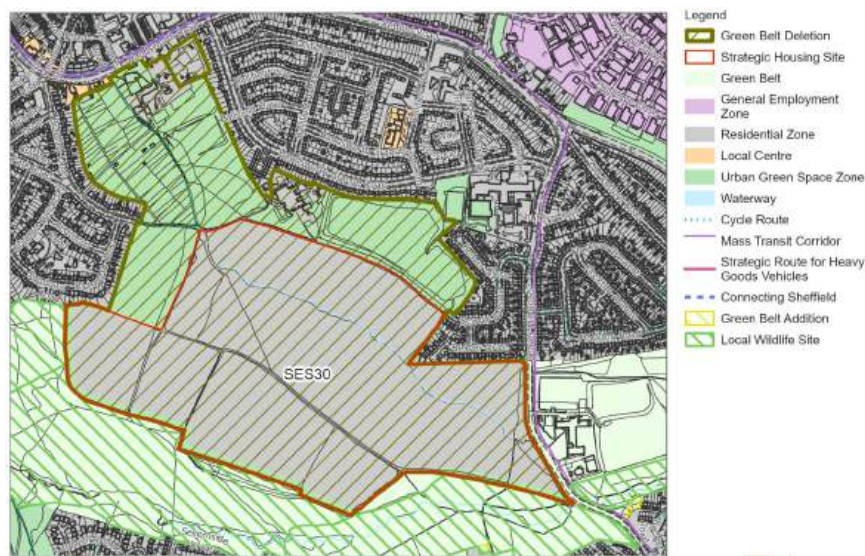
However, the indicator score – and the map itself – do not reflect the *availability* of open space in the surrounding area. Areas classified as open space are, in reality, buildings (such as the

¹⁰A site with 99% within 400m of a 3 bus-per-hour bus stop has the same score as a site with 1% – both have “some of the site” in the range. This indicator lacks the granularity to perform an accurate and fair comparison.

Lidl, Fire Training Centre, Handsworth Grange School, Ballifield School, St Mary's Church, and the rectory), not publicly accessible (school playing fields behind locked gates and fences, and private allotments), or functionally marginal spaces like grass verges, churchyards and car parks.

As a result, the map presents a misleading impression of the open space in the surrounding area. Figure 5b provides a different representation, with buildings, non-accessible and marginal spaces removed. With the development of SES30, the community is left with two small parcels, one of which is an arable field so cannot be used for recreation.

Note: Shirtcliffe Wood, located to the south, is inaccessible to many residents due to its steep-sided valley and unmade, slippery paths, which are difficult and hazardous to navigate. The valley floor frequently floods, making it impassable.



(a) Site map.



(b) Site map with non-accessible green space removed.

Figure 5: SES30 Site Maps

8.5 Trip Rate Information Computer System (TRICS) calculations

I do not have direct access to the proprietary TRICS database, which is available only to licensed users. However, the calculations below use estimates derived from publicly available TRICS-based reports, such as those published in planning applications and local authority documents.

The trip rates reflect standard methodological practices in TRICS analysis. The standard TRICS 07:00–19:00 totals are presented, with a 12% uplift applied to estimate 24-hour flows.

While indicative, I believe these data represent a credible estimate of traffic generated by SES30, the Lidl supermarket on Rotherham Road, and SES29.

8.5.1 SES30 TRICS calculations

Calculations based on 868 privately-owned suburban dwellings. Trip rates reflect TRICS survey data for edge-of-town/suburban locations with typical car ownership.

Time Period	Trip Rate (per dwelling)	Estimated Trips (In + Out)	Notes
07:00–19:00 (12-hr)	6.0 – 8.0	5,208 – 6,944	Standard TRICS survey window
00:00–24:00 (24-hr)		5,833 – 7,777	12% uplift applied
AM Peak (08:00–09:00)	0.70 – 0.90	608 – 781	
PM Peak (17:00–18:00)	0.65 – 0.85	564 – 738	

Table 3: SES30 Trip Generation Estimate.

8.5.2 Lidl TRICS calculations

Input data for the Lidl supermarket is taken from the Amended Proposed Plans (19/03/25) [39]. PM peak estimates assume a broadly even split of arrivals and departures.

Parameter	Value
Sales Floor Area	1,995 m ²
Trip Rate Basis	Per 100 m ² Gross Sales Floor Area
Trip Rate Factor	19.95
Parking Provision	100 spaces

Time Period	Trip Rate (per 100 m ²)	Estimated Trips (In + Out)
Daily (Low Estimate)	90	1,796
Daily (Mid Estimate)	110	2,195
Daily (High Estimate)	130	2,594
PM Peak (Low)	9	180
PM Peak (Mid)	12	239
PM Peak (High)	15	299

Table 4: Lidl Rotherham Road Trip Generation Estimate.

8.5.3 SES29 TRICS calculations

Calculations based on 770 privately-owned suburban dwellings. Trip rates reflect TRICS survey data for edge-of-town/suburban locations with typical car ownership.

Time Period	Trip Rate (per dwelling)	Estimated Trips (In + Out)	Notes
07:00–19:00 (12-hr)	6.0 – 8.0	4,620 – 6,160	Standard TRICS survey window
00:00–24:00 (24-hr)		5,174 – 6,899	12% uplift applied
AM Peak (08:00–09:00)	0.70 – 0.90	539 – 693	
PM Peak (17:00–18:00)	0.65 – 0.85	501 – 655	

Table 5: SES29 Trip Generation Estimate.

8.5.4 Availability of supporting evidence to Council

Evidence document	Publication date	In evidence base on 14 th May 2025?
Integrated Impact Assessment (Update & Addendum)	Apr 2025	Yes
Site-Selection Topic Paper (main report)	May 2025	Yes
Transport Assessment: Strategic Road Network	29 th May 2025	No
Transport Assessment: Local Road Network	29 th May 2025	No
Transport Assessment: Public Transport & Active-Travel	29 th May 2025	No
Level 2 Strategic Flood Risk Assessment: Main report	29 th May 2025	No
Level 2 SFRA: SES30 site sheets	29 th May 2025	No
Habitats Regulations Assessment: Appropriate Assessment (update)	29 th May 2025	No
Infrastructure Delivery Plan Part 2: Infrastructure Schedule Addendum	29 th May 2025	No
Heritage Impact Assessments: Additional Sites	29 th May 2025	No
Whole-Plan Viability Assessment: Further Note	29 th May 2025	No
Topic-Paper Appendices: individual site appraisals	29 th May 2025	No

Table 6: Availability of supporting evidence.

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